4. Interstitial Monitoring. Interstitial monitoring of double-walled or jacketed piping shall either be conducted continuously by means of an automatic leak sensing device that signals to the operator the presence of any regulated substance in the interstitial space or sump, or conducted manually every 30 days by means of a procedure capable of detecting the presence of any regulated substance in the interstitial space or sump.

a. The interstitial space or sump shall be maintained free of water, debris, or anything that could interfere with leak detection capabilities.

b. Subparagraph B.4.a of this Section does not apply to containment sumps that were installed prior to December 20, 2008, that do not utilize interstitial monitoring as a piping release detection method.

AUTHORITY NOTE: Promulgated in accordance with R.S. 30:2001 et seq.

HISTORICAL NOTE: Promulgated by the Department of Environmental Quality, Office of Solid and Hazardous Waste, Underground Storage Tank Division, LR 16:614 (July 1990), amended by the Office of Environmental Assessment, LR 31:1072 (May 2005), amended by the Office of the Secretary, Legal Affairs Division, LR 33: 2172 (October 2007), LR 34:

Herman Robinson, CPM
Executive Counsel

0711#028

POTPOURRI

Department of Environmental Quality
Office of the Secretary

State Implementation Plan for Regional Haze Program

Under the authority of the Louisiana Environmental Quality Act, R. S. 30:2001 et seq., the secretary gives notice that the Office of Environmental Assessment, Plan Development Section, will submit a proposed revision to the State Implementation Plan (SIP) for the Regional Haze Program as required under the Clean Air Act, Part C, Section 169, and 40 CFR Part 51.308. Regional haze is visibility impairment caused by the cumulative air pollutant emissions from numerous sources over a wide geographic area.

Section 169A of the Clean Air Act sets forth a national goal for visibility, which is the "prevention of any future, and the remedying of any existing, impairment of visibility in Class I areas which impairment results from manmade air pollution." Breton Wilderness Area, a chain of barrier islands approximately 30 miles off the southeast coast of Louisiana, is classified as a Class I Federal Area, and is afforded visibility protection under the Clean Air Act, Part C, Section 169, and 40 CFR Part 51.308.

A public hearing will be held at 1:30 p.m. on January 24, 2008, in the Galvez Building, Oliver Pollock Conference Room, 602 N. Fifth Street, Baton Rouge, LA. Should individuals with a disability need an accommodation in order to participate, please contact Vivian H. Aucoin at (225) 219-3575 or at the address listed below. Interested persons are invited to attend and submit oral comments on the proposal.

All interested persons are invited to submit written comments concerning the SIP revision no later than 4:30 p.m., January 31, 2008, to Vivian H. Aucoin, Office of Environmental Assessment, Box 4314, Baton Rouge, LA 70821-4314 or to FAX (225) 219-3582 or by e-mail to vivian.aucoin@la.gov.

A copy of the SIP revision for the Regional Haze Program may be viewed from 8 a.m. to 4:30 p.m. in the DEQ Public Records Center, Room 127, 602 N. Fifth Street, Baton Rouge, LA. The document is available on the Internet at www.deq.louisiana.gov/portal/Default.aspx?tabid=2381.

Herman Robinson
CPM Executive Counsel

0711#029

POTPOURRI

Office of the Governor
Division of Administration
Office of Facility Planning And Control

Public Hearing—Substantive Change—
Louisiana Building Code (LAC 34:III.131)

A Notice of Intent was published in the August 20, 2007, edition of the *Louisiana Register* (See LR Vol. 33, No. 08, pages 1725-1726), to establish the current editions of the Louisiana Building Code. That Notice of Intent established the 2003 Edition of the Life Safety Code, Standard 101 as the current edition. Since it was published the Louisiana Office of State Fire Marshal has adopted the 2006 Edition of the Life Safety Code, Standard 101 as the edition that it will enforce. In order to coordinate the Louisiana Building Code with the Louisiana Office of State Fire Marshal, Facility Planning and Control has determined that the 2006 Edition of the Life Safety Code, Standard 101 should be established as the current edition for the Louisiana Building Code. In addition, the statutory reference for the Louisiana Building Code in the Notice of Intent was incorrect. Therefore, the following amendment is hereby made to the proposed Rule.

Title 34
GOVERNMENT CONTRACTS, PROCUREMENT AND PROPERTY CONTROL
Part III. Facility Planning and Control
Chapter 1. Capital Improvement Projects
Subchapter A. Procedure Manual
§131. Louisiana Building Code

A. R.S. 40:1722 establishes the Louisiana Building Code and directs that the following codes be established as the standards as minimum standards for this code. These codes shall be established as constituting the code in the editions indicated:

1. the Life Safety Code, Standard 101, 2006 Edition as published by the National Fire Protection Association;
2. Part XIV (Plumbing) of the State Sanitary Code as promulgated by the secretary of the Department of Health and Hospitals;
3. the International Building Code, 2006 Edition as published by the International Code Council;
4. the International Mechanical Code, 2006 Edition as published by the International Code Council;
5. the National Electric Code (NFPA No. 70) 2005 Edition as published by the National Fire Protection Association.

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CAPITAL CITY PRESS

Publisher of
THE ADVOCATE

PROOF OF PUBLICATION

The hereto attached notice was
published in THE ADVOCATE,
a daily newspaper of general circulation
published in Baton Rouge, Louisiana,
and the official Journal
of the State of Louisiana,
the City of Baton Rouge,
and the Parish of East Baton Rouge,
in the following issues:

10/13/06

Susan A. Bush, Public Notices Clerk

Sworn and subscribed before me by the
person whose signature appears above:

October 13, 2006

Pegeen Singley, Notary Public, #66565
My Commission Expires: Indefinite
Baton Rouge, Louisiana

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REGULATION DEVELOPMENT SECTION

DEQ - OSEC/LARD REGULATION 343586
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PO BOX 4302
BATON ROUGE LA 70821-4314

POTPOURRI
Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Identification of BART Eligible Sources
(0610Pot3)

In a cover letter dated June 8, 2006, and electronically distributed, DEQ requested that all facilities that submit annual emissions reports to the Emission Inventory complete a second Best Available Retrofit Technology (BART) survey. The purpose of the second survey was to update the BART-eligible list to reflect the impact of Hurricanes Katrina and Rita on facilities in Louisiana. The BART-eligible list below is a requirement of Environmental Protection Agency (EPA) finalized amendments to the July 1999 Regional Haze Rule for Protection of Visibility in National Parks and Wilderness Areas. The final rule and other EPA documentation related to BART may be found at http://www.epa.gov/visibility/actions.html.

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Alexandria Plant	872	Procter & Gamble Manufacturing Company	2360-0051
Clifton Ridge Terminal	1006	CITGO Petroleum Corporation	0520-0036
Pontchartrain Diamines Unit	1101	DuPont	2580-0001
Geismar Plant	1136	Shell Chemical LP	0180-0010
Meraux Refinery	1238	Murphy Oil USA, Inc.	2500-0001
Lake Charles Facility	1244	Firestone Polymers LLC	0520-0007
Lake Charles Manufacturing Complex	1250	CITGO Petroleum	0520-0016
Derivatives	1255	PPG Industries, Inc.	0520-0004
Cabot Ville Platte Plant	1291	Cabot Corporation	0920-0001
Baton Rouge Facility	1314	Rhodia, Inc.	0840-0033
Bastrop - Louisiana Mill	1338	International Paper Company	1920-0001
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Gramercy Alumina	1388	Gramercy Alumina	2560-0002
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Baton Rouge Smelter	1396	Exide Technologies	0840-0004
Norco Refinery	1406	Motiva Enterprises LLC	2520-0002
Louisiana Operations	1409	The Dow Chemical Company	1280-0008
Geismar Plant	1433	Chemtura USA Corporation	0180-0012
Cos-Mar Styrene Monomer Plant	1607	TOTAL Petrochemicals USA, Inc.	1280-0013
Oak Point Plant	1708	Chevron Oronite Company LLC	2240-0001
Geismar Site	2049	BASF Corporation	0180-0013
St. Francisville Mill	2073	Tembec USA LLC	3160-0003
Taft/Star Manufacturing Complex	2083	Union Carbide Corp.	2520-0001
Pineville Mill	2140	International Paper	2360-0001
Sulfuric Acid Plant	2340	Chemtrade Refinery Services Inc.	0500-0003
Port Allen Refinery	2366	Placid Refining Company, L.L.C.	3120-0010
St. Gabriel Plant - HCN Unit	2367	Syngenta Crop Protection	1280-0007
St. James Styrene Facility	2384	Chevron Phillips Chemical Company, LP	2560-0007

CF Industries Donaldsonville	2416	CF Industries	0180-0004
Alliance Refinery	2418	ConocoPhillips Co.	2240-0015
Faustina Plant	2425	Mosaic Fertilizer LLC	2560-0005
Teche Power Station	2432	Cleco Power LLC	2660-0007
Ivanhoe Carbon Black Plant	2518	Degussa Engineered Carbons LP	2660-0018
Uncle Sam Plant	2532	Mosaic Fertilizer LLC	2560-0004
Port Hudson Operations	2617	Georgia Pacific	0840-0010
Willow Glen	2625	Entergy Gulf States	1280-0010
ExxonMobil Baton Rouge Refinery	2638	ExxonMobil Refining & Supply Co.	0840-0015
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Rodemacher Power Station	2922	Cleco Power LLC	2360-0010
Garyville Refinery	3165	Marathon Petroleum Company LLC-LA Refining Division	2580-0013
Lake Charles Chemical Plant	3271	Sasol North America Inc.	0520-0017
Facility Wide	3647	Smurfit-Stone Container Enterprise, Inc.	1300-0001
Geismar Plant - Ammonia Group	3732	PCS Nitrogen	0180-0028
Addis Plant	4174	Sid Richardson Carbon Company	3120-0006
North Bend	4998	Columbian Chemicals Company	2660-0005
Lake Charles Plant	5337	Equistar Chemicals	0520-0002
Geismar Ethylene Plant	5565	Williams Olefins LLC	0180-0030
Nelson	7893	Entergy Gulf States	0520-0014
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Pecan Grove Tank	37119	CITGO Petroleum Corporation	0520-0035
Pontchartrain Chloroprene Unit	38806	DuPont Performance Elastomers	2580-0041
Big Cajun 2 Power Plant	38867	Louisiana Generating LLC	2260-0005
Bogalusa Mill	38936	Temple Inland	3060-0001
Burnside Plant	67572	E.I. du Pont de Nemours & Co., Inc.	0180-0007
Waterford	83898	Entergy Louisiana	2520-0014

Herman Robinson, CPM
Executive Counsel

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Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Identification of BART Eligible Sources (0610Pot3)

In a cover letter dated June 8, 2006, and electronically distributed, DEQ requested that all facilities that submit annual emissions reports to the Emission Inventory complete a second Best Available Retrofit Technology (BART) survey. The purpose of the second survey was to update the BART-eligible list to reflect the impact of Hurricanes Katrina and Rita on facilities in Louisiana. The BART-eligible list below is a requirement of Environmental Protection Agency (EPA) finalized amendments to the July 1999 Regional Haze Rule for Protection of Visibility in National Parks and Wilderness Areas. The final rule and other EPA documentation related to BART may be found at http://www.epa.gov/visibility/actions.html.

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FACILITY NAME
AI NUMBER
COMPANY NAME
EIS ID

Baton Rouge Chemical Plant - 286 - ExxonMobil - 0840-0014

Little Gypsy - 687 - Entergy Louisiana - 2520-0009

Alexandria Plant - 872 - Procter & Gamble Manufacturing Company - 2360-0051

Clifton Ridge Terminal - 1006 - CITGO Petroleum Corporation - 0520-0036

Pontchartrain Diamines Unit - 1101 - DuPont - 2580-0001

Geismar Plant - 1136 - Shell Chemical LP - 0108-0010

Meraux Refinery - 1238 - Murphy Oil USA, Inc. - 2500-0001

Lake Charles Facility - 1244 - Firestone Polymers LLC - 0520-0007

Lake Charles Manufacturing - 1250 - CITGO Petroleum - 0520-0016

Complex Derivatives - 1255 - PPG Industries, Inc. - 0520-0004

Cabot Ville Platte Plant - 1291 - Cabot Corporation - 0920-00012

Baton Rouge Facility - 1314 - Rhodia, Inc. - 0840-0033

Bastrop - Louisiana Mill - 1338 - International Paper Company - 1920-0001

Chalmette Refinery - 1376 - Chalmette Refining, L.L.C. - 2500-0005

Gramercy Alumina - 1388 - Gramercy Alumina - 2560-0002

Baton Rouge Plant - 1395 - Lion Copolymer LLC - 0840-0008

Baton Rouge Smelter - 1396 - Exide Technologies - 0840-0004

Norco Refinery - 1406 - Motiva Enterprises LLC - 2520-0002

Louisiana Operations - 1409 - The Dow Chemical Company - 1280-0008

Geismar Plant - 1433 - Chemtura USA Corporation - 0180-0012

Cos-Mar Styrene Monomer Plant - 1607 - TOTAL Petrochemicals USA, Inc. - 1280-0013

Oak Point Plant - 1708 - Chevron Oronite Company LLC - 2240-0001

I, Bill Buschmann, Advertising Sales Manager of THE TOWN TALK, published at Alexandria, Louisiana do solemnly swear that the Public Notice 0610Pot3 advertisement, as per clipping attached, was published in the regular and entire issue of said newspaper, and not in any supplement thereof for one insertion commencing with the issue dated October 18, 2006 and ending with the issue dated October 18, 2006.

Bill Buschmann

Subscribed and sworn to before me this 23rd day of October, 2006

Notary Number 01988

Geismar Site - 2049 - BASF Corporation - 0180-0013

St. Francisville Mill - 2073 - Tembec USA LLC - 3160-0003

Taft/Star Manufacturing Complex - 2083 - Union Carbide Corp. - 2520-0001

Pineville Mill - 2140 - International Paper - 2360-0001

Sulfuric Acid Plant - 2340 - Chemtrade Refinery Services Inc. - 0500-0003

Port Allen Refinery - 2366 - Placid Refinig Company, L.L.C. - 3120-0010

St. Gabriel Plant - HCN Unit - 2367 - Syngenta Crop Protection - 1280-0007

St. James Styrene Facility - 2384 - Chevron Phillips Chemical Company, LP - 2560-0007

CF Industries Donaldsonville - 2416 - CF Industries - 0180-0004

Alliance Refinery - 2418 - ConocoPhillips Co. - 2240-0015

Faustina Plant - 2425 - Mosaic Fertilizer LLC - 2560-0005

Teche Power Station - 2432 - Cleco Power LLC - 2660-0007

Ivanhoe Carbon Black Plant - 2518 - Degussa Engineered Carbons LP - 2660-0018

Uncle Sam Plant - 2532 - Mosaic Fertilizer LLC - 2560-0004

Port Hudson Operations - 2617 - Georgia Pacific - 0840-0010

Willow Glen - 2625 - Entergy Gulf States - 1280-0010

ExxonMobil - Baton Rouge Refinery - 2638 - ExxonMobil Refining & Supply Co. - 0840-0015

Red River Mill - 2645 - Weyerhaeuser Company - 1980-0004

Convent Refinery - 2719 - Motiva Enterprises LLC - 2560-0001

Ninemile Point - 2841 - Entergy Louisiana - 1340-0006

Rodemacher Power Station - 2922 - Cleco Power LLC - 2360-0010

Garyville Refinery - 3165 - Marathon Petroleum Company LLC - LA Refining Division - 2580-0013

Lake Charles Chemical Plant - 3271 - Sasol North America Inc. - 0520-0017

Facility Wide - 3647 - Smurfit-Stone Container Enterprise, Inc. - [redacted] - 1300-0001

Geismar Plant - Ammonia Group - 3732 - PCS Nitrogen - 0180-0028

Addis Plant - 4174 - Sid Richardson Carbon Company - 3120-0006

North Bend - 4998 - Columbian Chemicals Company - 2660-0005

Lake Charles Plant - 5337 - Equistar Chemicals - 0520-0002

Geismar Ethylene Plant - 5565 - Williams Olefins LLC - 0180-0030

Nelson - 7893 - Entergy Gulf States - 0520-0014

Ruston Electrical Generation Station - 81674 - City of Ruston - 1720-0007

Houma Generating Station - 88388 - Terrebonne Parish Consolidated Government - 2880-0019

Big Cajun 1 Power Plant - 11917 - Louisiana Generating LLC - 12260-0010

Springfield Boiler - 19375 - City of Natchitoches Utility Dept. - 1980-0009

Sterlington 19483 - Entergy Louisiana - 2160-0004

Canal Plant - 19901 - Cabot Corporation - 2660-0004

DeRidder Paper Mill - 19933 - Boise Cascade - 0320-0002

Sterlington Ammonia Plant - 23941 - Koch Nitrogen Company - 2160-0017

St. Charles Refinery - 26003 - Valero Refining New Orleans, LLC - 2520-0016

Plaquemine Steam Plant - 26034 - Louisiana Energy and Power Authority - 1280-0044

Morgan City Steam Plant - 26326 - Louisiana Energy and Power Authority - 2680-0069

Norco Chemical Plant - East Site - 26336 - Shell Chemical LP - 2520-0079

Lake Charles Plant - 27051 - Lyondell Chemical Company - 0520-0189

Louis "Doc" Bonin Electric Generation Station - 31135 - Lafayette Utilities System - 1520-0002

Michoud - 32494 - Entergy New Orleans - 2140-0014

St. James Terminal - 36538 - Koch Pipeline Company, LP - 2560-0006

Pecan Grove Tank - 37119 - CITGO Petroleum Corporation - 0520-0035

Pontchartrain Chloroprene Unit - 38806 - DuPont Performance Elastomers - 2580-0041

Big Cajun 2 Power Plant - 38867 - Louisiana Generating LLC - 2260-0005

Bogalusa Mill - 38936 - Temple Inland - 3060-0001

Burnside Plant - 67572 - E. I. duPont de Nemours & Co., Inc. - 0180-0007

Waterford 3 - 83898 - Entergy Louisiana - 2520-0014

HERMAN ROBINSON, CPM
Executive Counsel

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Affidavit of Publication

STATE OF LOUISIANA
Parish of Calcasieu

Before me the undersigned authority, personally came and appeared

Cardi Dickson

who being duly sworn, deposes and says:

He/She is a duly authorized agent of
LAKE CHARLES AMERICAN PRESS
a newspaper published daily at 4900 Highway 90 East,
Lake Charles, Louisiana, 70615. (Mail address: P.O. Box 2893
Lake Charles, LA 70602)

The attached Notice was published in said newspaper in its issue(s) dated:

00298122 - $101.00 0610Pot3
October 12, 2006

00053262
LA. DEQ OSEC/LARD
REGULATION DEVELOPMENT
REMENDER WEATHERSPOON
P.O. BOX 4302
BATON ROUGE, LA 70821-4302

Cardi Dickson

Duly Authorized Agent

Subscribed and sworn to before me on this 12th day of October, 2006 at Lake Charles, LA

Gwendolyn K Douglas

Notary Public

00053262

LA. DEQ OSEC/LARD

POTPOURRI
Department of Environmental Quality
Office of the Secretary
Legal Affairs Division
Identification of BART Eligible Sources
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Herman Robinson, CPM
Executive Counsel

October 12
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REGULATION DEVELOPMENT SECTION

POTPOURRI

Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Identification of BART Eligible Sources
(0610Pot3)

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Publisher of

THE NEWS-STAR
MONROE, LOUISIANA
PROOF OF PUBLICATION

The hereto attached advertisement

Was published in the NEWS-STAR.

A daily newspaper of general circulation.

Published in Monroe, Louisiana.

Parish of Ouachita in the issues of:

October 19, 2006

LEGAL AD DEPT.

Sworn and subscribed before me by

The person whose signature appears above in Monroe, LA on this

19 **day of** October **20** 06 **AD**

Steven L. Turner # 43154
NOTARY PUBLIC

FACILITY NAME - AI NUMBER - COMPANY NAME - EIS ID

Baton Rouge Chemical Plant - 286 - ExxonMobil - 0840-0014

Little Gypsy - 687 - Entergy Louisiana - 2520-0009

Alexandria Plant - 872 - Procter & Gamble Manufacturing Company - 2360-0051

Clifton Ridge Terminal - 1006 - CITGO Petroleum Corporation - 0520-0036

Pontchartrain Diamines Unit - 1101 - DuPont - 2580-0001

Geismar Plant - 1136 - Shell Chemical LP - 0180-0010

Meraux Refinery - 1238 - Murphy Oil USA, Inc. - 2500-0001

Lake Charles Facility - 1244 - Firestone Polymers LLC - 0520-0007

Lake Charles Manufacturing Complex - 1250 - CITGO Petroleum - 0520-0016

Derivatives - 1255 - PPG Industries, Inc. - 0520-0004

Cabot Ville Platte Plant - 1291 Cabot Corporation - 0920-0001

Baton Rouge Facility - 1314 - Rhodia, Inc. - 0840-0033

Bastrop - Louisiana Mill - 1338 - International Paper Company - 1920-0001

Chalmette Refinery - 1376 - Chalmette Refining, L.L.C. - 2500-0005

Gramercy Alumina - 1388 - Gramercy Alumina - 2560-0002

Baton Rouge Plant - 1395 - Lion Copolymer LLC - 0840-0008

Baton Rouge Smelter - 1396 - Exide Technologies - 0840-0004

Norco Refinery - 1406 - Motiva Enterprises LLC - 2520-0002

Louisiana Operations - 1409 - The Dow Chemical Company - 1280-0008

Geismar Plant - 1433 - Chemtura USA Corporation - 0180-0012

Cos-Mar Styrene Monomer Plant - 1607 - TOTAL Petrochemicals USA, Inc. - 1280-0013

Oak Point Plant - 1708 - Chevron Oronite Company LLC - 2240-0001

Geismar Site - 2049 - BASF Corporation - 0180-0013

St. Francisville Mill - 2073 - Tembec USA LLC - 3160-0003

Taft/Star Manufacturing Complex - 2083 - Union Carbide Corp. - 2520-0001

Pineville Mill - 2140 - International Paper - 2360-0001

Sulfuric Acid Plant - 2340 - Chemtrade Refinery Services Inc. - 0500-0003

Port Allen Refinery - 2366 - Placid Refining Company, L.L.C. - 3120-0010

St. Gabriel Plant - HCN Unit - 2367 - Syngenta Crop Protection - 1280-0007

St. James Styrene Facility - 2384 - Chevron Phillips Chemical Company, LP - 2560-0007

CF Industries Donaldsonville - 2416 - CF Industries - 0180-0004

Alliance Refinery - 2418 - ConocoPhillips Co. - 2240-0015

Faustina Plant - 2425 - Mosaic Fertilizer LLC - 2560-0005

Teche Power Station - 2432 - Cleco Power LLC - 2660-0007

Ivanhoe Carbon Black Plant - 2518 - Degussa Engineered Carbons LP - 2660-0018

Uncle Sam Plant - 2532 - Mosaic Fertilizer LLC - 2560-0004

Port Hudson Operations - 2617 - Georgia Pacific - 0840-0010

Willow Glen - 2625 - Entergy Gulf States - 1280-0010

ExxonMobil Baton Rouge Refinery - 2638 - ExxonMobil Refining & Supply Co. - 0840-0015

Red River Mill - 2645 - Weyerhaeuser Company 1980-0004

Convent Refinery - 2719 - Motiva Enterprises LLC - 2560-0001

Ninemile Point - 2841 - Entergy Louisiana - 1340-0006

Rodemacher Power Station - 2922 - Cleco Power LLC - 2360-0010

Garyville Refinery - 3165 - Marathon Petroleum Company LLC-LA Refining Division - 2580-0013

Lake Charles Chemical Plant - 3271 - Sasol North America Inc. - 0520-0017

Facility Wide - 3647 - Smurfit-Stone Container Enterprise, Inc - 1300-0001

Geismar Plant - Ammonia Group - 3732 - PCS Nitrogen - 0180-0028

Addis Plant - 4174 - Sid Richardson Carbon Company - 3120-0006

North Bend - 4998 - Columbian Chemicals Company - 2660-0005

Lake Charles Plant - 5337 - Equistar Chemicals - 0520-0002

Geismar Ethylene Plant - 5565 - Williams Olefins LLC - 0180-0030

Nelson - 7893 - Entergy Gulf States - 0520-0014

Ruston Electrical Generation Station - 8167 - City of Ruston - 1720-0007

Houma Generating Station - 8838 - Terrebonne Parish Consolidated Government - 2880-0019

Big Cajun 1 Power Plant - 11917 - Louisiana Generating LLC - 2260-0010

Springfield Boiler - 19375 - City of Natchitoches Utility Dept. - 1980-0009

Sterlington - 19483 - Entergy Louisiana - 2160-0004

Canal Plant - 19901 - Cabot Corporation - 2660-0004

DeRidder Paper Mill - 19933 - Boise Cascade - 0320-0002

Sterlington Ammonia Plant - 23941 - Koch Nitrogen Company - 2160-0017

St. Charles Refinery - 26003 - Valero Refining-New Orleans, LLC - 2520-0016

Plaquemine Steam Plant - 26034 - Louisiana Energy and Power Authority - 1280-0044

Morgan City Steam Plant - 26326 - Louisiana Energy and Power Authority - 2660-0069

Norco Chemical Plant - East Site - 26336 - Shell Chemical LP - 2520-0079

Lake Charles Plant - 27051 - Lyondell Chemical Company - 0520-0189

Louis "Doc" Bonin Electric Generation Station - 31135 - Lafayette Utilities System - 1520-0002

Michoud - 32494 - Entergy New Orleans - 2140-0014

St. James Terminal - 36538 - Koch Pipeline Company, L.P. - 2560-0006

Pecan Grove Tank - 37119 - CITGO Petroleum Corporation - 0520-0035

Pontchartrain Chloroprene Unit - 38806 - DuPont Performance Elastomers - 2580-0041

Big Cajun 2 Power Plant - 38867 - Louisiana Generating LLC - 2260-0005

Bogalusa Mill - 38936 - Temple Inland - 3060-0001

Burnside Plant - 67572 - E.I. du Pont de Nemours & Co., Inc. - 0180-0007

Waterford - 83898 - Entergy Louisiana - 2520-0014

Herman Robinson, CPM
Executive Counsel

Monroe, LA
October 19, 2006

CERTIFIED COPY

The Times

PROOF OF PUBLICATION

POTPOURRI
Department of Environmental Quality
Office of the Secretary
Legal Affairs Division

Identification of BART Eligible Sources (0610Pot3)

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STATE OF LOUISIANA

PARISH OF CADDO

Before me, the undersigned authority, personally came and appeared

Altheas Critton personally known to me,

Who being duly sworn, deposes and says that she is the Assistant to the Classified Advertising Manager of The Times, and that the attached Advertisement entitled:

POTPOURRI (0610Pot3)

As per copy of advertisement hereto annexed, was published in The Times on the following dates to wit:

October 12, 2006

(Signed) Altheas Critton

Sworn to and subscribed before me this 12th day of October, 2006

Diana W. Barber

DIANA W. BARBER, NOTARY PUBLIC # 60491
CADDO PARISH, LOUISIANA
MY COMMISSION IS FOR LIFE. (Notary)

GANNETT

FACILITY NAME	AI NUMBER	COMPANY NAME	EIS ID
Baton Rouge Chemical Plant	286	ExxonMobil	0840-0014
Little Gypsy	687	Entergy Louisiana	2520-0009
Alexandria Plant	872	Procter & Gamble Manufacturing Company	2860-0051
Clifton Ridge Terminal	1006	CITGO Petroleum Corporation	0520-0036
Pontchartrain Diamines Unit	1101	DuPont	2580-0001
Geismar Plant	1136	Shell Chemical LP	0180-0010
Meraux Refinery	1238	Murphy Oil USA, Inc.	2500-0001
Lake Charles Facility	1244	Firestone Polymers LLC	0520-0007
Lake Charles Manufacturing Complex	1250	CITGO Petroleum	0520-0016
Derivatives	1255	PPG Industries, Inc.	0520-0004
Cabot Ville Platte Plant	1291	Cabot Corporation	0920-0001
Baton Rouge Facility	1314	Rhodia, Inc.	0840-0033
Bastrop - Louisiana Mill	1338	International Paper Company	1920-0001
Chalmette Refinery	1376	Chalmette Refining, L.L.C.	2500-0005
Gramercy Alumina	1388	Gramercy Alumina	2560-0002
Baton Rouge Plant	1395	Lion Copolymer LLC	0840-0008
Baton Rouge Smelter	1396	Exide Technologies	0840-0004
Norco Refinery	1406	Motiva Enterprises LLC	2520-0002
Louisiana Operations	1409	The Dow Chemical Company	1280-0008
Geismar Plant	1433	Chemtura USA Corporation	0180-0012
Cos-Mar Styrene Monomer Plant	1607	TOTAL Petrochemicals USA, Inc.	1280-0013
Oak Point Plant	1708	Chevron Oronite Company LLC	2240-0001
Geismar Site	2049	BASF Corporation	0180-0013
St. Francisville Mill	2073	Tembeca USA LLC	3160-0003
Taft/Star Manufacturing Complex	2083	Union Carbide Corp.	2520-0001
Pineville Mill	2140	International Paper	2360-0001
Sulfuric Acid Plant	2340	Chemtrade Refinery Services Inc.	0500-0003
Port Allen Refinery	2366	Placid Refining Company, L.L.C.	3120-0010
St. Gabriel Plant - HCN Unit	2367	Syngenta Crop Protection	1280-0007
St. James Styrene Facility	2384	Chevron Phillips Chemical Company, LP	2560-0007
CF Industries	2416	CF Industries	0180-0004
Donaldsonville	2418	ConocoPhillips Co.	2240-0015
Alliance Refinery	2425	Mosaic Fertilizer LLC	2560-0005
Faustina Plant	2432	Cleco Power LLC	2660-0007
Teche Power Station	2617	Degussa Engineered Carbons LP	2660-0018
Ivanhoe Carbon Black Plant	2625	Mosaic Fertilizer LLC	2560-0004
Uncle Sam Plant	2638	Georgia Pacific	840-0010
Port Hudson Operations	2645	Entergy Gulf States	1280-0010
Willow Glen ExxonMobil	2719	ExxonMobile Refining & Supply Co.	0840-0015
Baton rouge Refinery	2841	Weyerhaeuser Company	1980-0004
Red River Mill	2922	Motiva Enterprises LLC	2560-0001
Convent Refinery	3165	Entergy Louisiana	1340-0006
Ninemile Point	3271	Cleco Power LLC	2360-0010
Rodemacher Power Station	3647	Marathon Petroleum Company LLC LA Revining Division	2580-0013
Garyville Refinery	3732	Sasol North America Inc.	0520-0017
Lake Charles Chemical Plant	4174	Smurfit Stone Container Enterprise, Inc	1300-0001
Facility Wide	4998	PCS Nitrogen	0180-0028
Geismar Plant - Ammonia Group	5337	Sid Richardson Carbon Company	3120-0006
Addis Plant	5565	Columbian Chemicals Company	2660-0005
North Bend	7893	Equistar Chemicals	0520-0002
Lake Charles Plant	8167	Williams Olefins LLC	0180-0030
Geismar Ethylene Plant	8838	Entergy Gulf States	0520-0014
Nelson	11917	City of Ruston	1720-0007
Ruston Electrical Generation Station	19375	Terrebonne Parish Consolidated Government	2880-0019
Houma Generating Station Big Cajun 1 Power Plant	19483	Louisiana Generating LLC	2260-0010
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Sterlington Canal Plant	19933	Entergy Louisiana	2160-0004
DeRidder Paper Mill	23941	Cabot Corporation	2660-0004
sterlington Ammonia Plant	26003	Boise Cascade	0320-0002
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Plaquemine Steam Plant	26326	Valero Refining-New Orleans, KKC	2520-0016
Morgan City Steam Plant	26336	Louisiana Energy and Power Authority	1280-0044
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Lake Charles Plant	31135	Shell Chemical LP	2520-0079
Louis "Doc" Bonin Electric Generation Station	32494	Lyondell Chemical Company	0520-0189
Michoud	36538	Lafayette Utilities System	1520-0002
St. James Terminal	37119	Entergy New Orleans	2140-0014
Pecan Grove Tank	38806	Koche Pipeline Company, L.P.	2560-0006
Pontchartrain	38867	CITGO Petroleum Corporation	0520-0035
Chloroprene Unit	38936	DuPont Performance Elastomers	2580-0041
Big Cajun 2 Power Plant	67572	Louisiana Generating LLC	2260-0005
Bogalusa Mill	83898	Temple-Inland	3060-0001
Burnside Plant		E.I. du Pont de Nemours & Co., Inc.	0180-0007
Waterford		Entergy Louisiana	2520-0014

Herman Robinson, CPM
Executive Counsel

The Times:
October 12, 2006

CERTIFIED COPY

RECEIVED
OCT 18 2006
LDEQ/OSEC/LAD
REGULATION DEVELOPMENT SECTION

Acadiana's Daily Newspaper

THE ADVERTISER

1100 Bertrand Drive
LAFAYETTE, LA 70506

PHONE: (337) 289-6300
FAX: (337) 289-6466

AFFIDAVIT OF PUBLICATION

Remender D. Weatherspoon
LA Department of Environmental Quality
OSEC/Legal Affairs Division/
Regulation Development Section
P. O. Box 4302
Baton Rouge, LA 70821-4302

Account No.:	**8DEQRD**
Ad Number:	**673636**
Ad Total:	**$219.25**
No. of Lines:	**5 columns x 8.75"**
Reference No.:	**Visa Purchase**

To insure proper credit please refer to your **account number and/or ad number when making payment. Remittance address: P.O. Box 3268, Lafayette, LA 70502-3268

I, **ROSE PENFOLD,** do solemnly swear that I am the LEGAL CLERK of THE ADVERTISER, a newspaper printed and published at Lafayette, in the Parish of Lafayette, State of Louisiana, and that from my personal knowledge and reference to the files of said publication, the advertisement of

POTPOURRI
Department of Environmental Quality
Office of the Secretary
Legal Affairs Division
Identification of BART Eligible Sources
(0610Pot3)

was published in **THE ADVERTISER** on the following dates:

***Friday, October 13, 2006**

Rose Penfold

ROSE PENFOLD
LEGAL CLERK

Sworn to and subscribed before me this 16 day of October, 2006.

Christie Kean

NOTARY PUBLIC - ID#58555

673636

POTPOURRI

Department of Environmental Quality
Office of the Secretary
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Herman Robinson, CPM
Executive Counsel

D

PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT

ON THE

STATE IMPLEMENTATION PLAN

AND

AMENDMENTS TO THE AIR, RADIATION PROTECTION AND SOLID WASTE REGULATIONS

Pot. 0711 Pot 2

The above-entitled Public Hearing was held at the Galvez Building, Oliver Pollock Conference Room, 602 N. Fifth Street, Baton Rouge, Louisiana, on Thursday, January 24, 2008, commencing at 1:30 p.m.

ORIGINAL

Reported by:

Denise M. Naquin
Certified Court Reporter

ASSOCIATED REPORTERS, INC.
DENISE M. NAQUIN, CCR
Certified Court Reporter
(504) 529-3355

SANDRA STEPHENS:

Good afternoon. My name is Sandy Stephens, and I'm employed by the Louisiana Department of Environmental Quality. I'll be serving as hearing officer this afternoon to receive comments regarding a proposed revision to the State Implementation Plan, and amendments to the Air, Radiation Protection and Solid Waste regulations.

The comment period for the State Implementation Plan revision began on November 20, 2007, and the comment periods for the regulation amendments began on December 20, 2007, when the potpourri notice and notices of intent were published in the *Louisiana Register*. The comment period will close at 4:30 p.m., today, January 24, 2008, for the Log Number RP047ft, and at 4:30 p.m., January 31, 2008, for the State Implementation Plan revision and for the Log Number AQ288 and SW046. It would be helpful to us if all oral comments received today were followed up in writing.

This public hearing provides a forum for all interested parties to present comments on the proposed changes. This hearing is not being conducted in a question and answer format. Please remember that the purpose of this public hearing is

to allow you, the public, and opportunity to express your thoughts concerning today's proposed amendments.

I'll ask that each person commenting come up and sit at the front table and begin by stating his or her name and affiliation for the record.

The first item on today's agenda is potpourri 0711Pot2, which gives notice of a revision to the State Implementation Plan for air quality.

The Office of Environmental Assessment, Plan Development Section, will submit a proposed revision to the State Implementation Plan (SIP) for the regional Haze Program as required under the Clean Air Act, Part C, Section 169, and 40 CFR Part 51.308. Regional haze is visibility impairment caused by the cumulative air pollutant emissions from numerous sources over a wide geographic area. Section 169A of the Clean Air Act sets forth a national goal for visibility , which is the "prevention of any future, and the remedying of any existing, impairment of visibility in Class I areas, which results from manmade air pollution." Breton Wilderness Area, a chain of barrier islands approximately 30 miles off the southeast coast of Louisiana, is classified as a Class I Federal Area,

and is afforded visibility protection under the Clean Air Act, Part C, Section 169, and 40 CFR Part 51.308.

Does anyone care to comment on this potpourri? (At this time, there was no response from the audience.)

If not, the hearing on the State Implementation Plan for the Regional Haze Program is closed.

Thank you for your attention and participation. This hearing is closed.

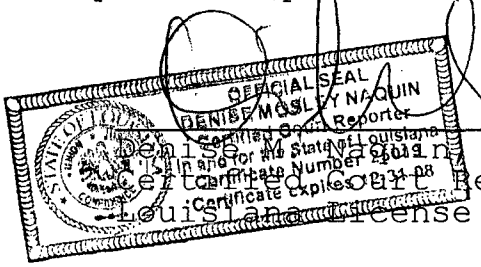
(The hearing was concluded at 1:39 p.m.)

REPORTER'S PAGE

I, Denise M. Naquin, Certified Court Reporter, in and for the State of Louisiana, the officer, as defined in Rule 28 of the Federal Rules of Civil Procedure and/or Article 1434 (b) of the Louisiana Code of Civil Procedure, before whom this sworn testimony was taken, do hereby state on the Record:

That due to the interaction in the spontaneous discourse of this proceeding, dashes (--) have been used to indicate pauses, changes in thought, and/or talkovers; that same is the proper method for a Court Reporter's transcription of proceeding, and that the dashes (--) do not indicate that words or phrases have been left out of this transcript;

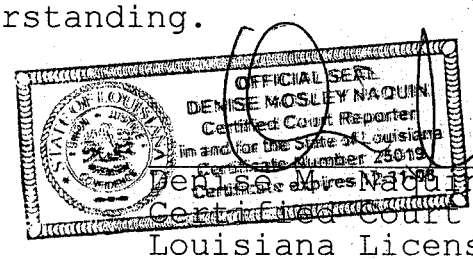
That any words and/or names which could not be verified through reference material have been denoted with the phrase "(phonetic)."



Denise M. Naquin, CCR
Certified Court Reporter
Louisiana License #25019

C E R T I F I C A T E

I, Denise M. Naquin, Certified Court Reporter, in and for the State of Louisiana, as the officer before whom this meeting was taken, do hereby certify that the above and foregoing pages are a true and correct transcription of the voice-writing method of the proceedings herein, reported by me at the time and place hereinabove stated and thereafter, was prepared and transcribed by me or under my personal direction and supervision, and is a true and correct transcript to the best of my ability and understanding.



Denise M. Naquin, CCR
Certified Court Reporter
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LOUISIANA MID-CONTINENT OIL AND GAS ASSOCIATION

801 NORTH BOULEVARD, SUITE 201, BATON ROUGE, LA 70802-5727
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January 31, 2008

Ms. Vivian H. Aucoin
LDEQ Office of Environmental Assessment
Post Office Box 4314
Baton Rouge, Louisiana 70821-4314

Re: State Implementation Plan for Regional Haze Program

Dear Ms. Aucoin:

The Louisiana Mid-Continent Oil and Gas Association appreciates the opportunity to comment on the State Implementation Plan for Regional Haze Program which appeared as a Potpourri notice (0711Pot2) in the November 20, 2007 Louisiana Register. Mid-Continent is an industry trade association representing individuals and companies who together produce, transport, refine and market crude oil, natural gas, petroleum products and electricity in Louisiana.

Comment 1 – Section 7.2

Mid-Continent would like to note for the record that the Emission Inventory reporting thresholds for several parishes are well below the 100 ton threshold cited in the plan. These thresholds are found in LAC 33:III.Section 919.

Comment 2 – Section 9.1

Mid-Continent has some concerns regarding the plan's statement that ammonia emissions will be lowered due to the state air toxic programs. Many of the NOx reductions cited for CAIR and the Refinery Consent Decrees will require ammonia injection. At some facilities, ammonia emissions will greatly increase due to the NOx control requirements. Additionally, DEQ in the December 20, 2007 Louisiana Register issued a Potpourri notice seeking comment on whether ammonia should be delisted from the state air toxics program.

Comment 3

Mid-Continent believes it should be noted somewhere in the plan itself that the ConocoPhillips passes the refined modeling criteria if the emission reductions that will result from their consent decree are included. While this is indicated in the appendix, it should be noted somewhere in the body of the plan itself.

Once again, Mid-Continent appreciates the opportunity to submit these comments.

Very truly yours,

Richard T. Metcalf
Health, Safety and Environmental
Affairs Coordinator

Michelle "Correa" Morgan

From: Vivian Aucoin
Sent: Wednesday, June 04, 2008 1:51 PM
To: Michelle "Correa" Morgan
Subject: FW: Reference: Comments on the Proposed Regional Haze SIP Rule

Vivian H. Aucoin
Environmental Scientist Supervisor
Office of Environmental Assessment, Planning Division P. O. Box 4314 Baton Rouge, La. 70821-4314
225-219-3575
vivian.aucoin@la.gov

-----Original Message-----
From: Kelly Bradberry [mailto:kellyb@sageenvironmental.com]
Sent: Wednesday, January 30, 2008 4:37 PM
To: Vivian Aucoin
Cc: Poche, Larry:; steven.w.johnson@conocophillips.com; Shawn Pritchett
Subject: Reference: Comments on the Proposed Regional Haze SIP Rule

Ms. Aucoin,

In accordance with the instructions issued in the Potpourri Notice 0711Pot2, published in the Louisiana Register, 11/20/2007, on behalf of our client, ConocoPhillips Alliance Refinery (ConocoPhillips), Sage Environmental Consulting LP is submitting the following comment to the proposed Regional Haze SIP Rule. Please review the comment submitted below and consider incorporating the following revisions.

Refer to Chapter 9, p. 9-11, Table 9.4: The table and associated text do not clearly indicate the source of the modeled impact results listed in the table. We surmise that the values are from the results of a CALPUFF BART screening runs 2001/2002 cases, performed by LDEQ and/or its contractor, as indicated in the figures following this table. The report text referring to the table does not explicitly state the origin of the number. Please consider adding text or a footnote to a reference that clearly specifies/indicates the source of these results.

Thank you for your consideration of this issue.

Respectfully,

Kelly Jean Bradberry

Client Service Manager

Sage Environmental Consulting, L.P.

"Friendly Service, No Surprises!"(tm)

8440 Jefferson Hwy., Suite 400

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INFORMATION MEMORANDUM FOR THE ASSISTANT SECRETARY FISH AND WILDLIFE AND PARKS

FROM: Sandra Silva, Chief, Branch of Air Quality, US Fish and Wildlife Service

PHONE #: 303 914-3801

SUBJECT: FWS Comments on the draft Louisiana (LA) Regional Haze State Implementation Plan (plan)

I. SUMMARY

In 1999, EPA issued regulations requiring all States to make reasonable progress toward the national visibility goal of no human-caused visibility impairment at all Class I areas. The FWS administers 21 Class I areas. The regulations require all States to establish plans by 2007, including initial control of older major stationary sources with Best Available Retrofit Technology (BART).

In reviewing the draft Regional Haze plan provided by Louisiana, FWS found that several requirements of the Regional Haze Rule were deficient in the plan. These elements include: insufficient analysis of reasonable progress and long term strategy for regional haze; inadequate inter-state apportionment and consultation; lacking information regarding Best Achievable Control Technology (BART); and omission of established visibility goals, as expressed in deciviews, for the 20% worst and the 20% best visibility days at the Breton Wilderness Area.

The FWS has communicated these concerns to LA through several consultation phone calls. The due date for submitting the comments to the State is **January 20, 2008**.

II. DISCUSSION

The Clean Air Act requires all States to consult with the Federal Land Mangers of Class I areas 60 days before a public hearing on any portion of the State's plan to address visibility impairment. The Louisiana plan is one of more than 35 plans the FWS Branch of Air Quality will review and provide technical feedback to the State. Due to the number of plans being reviewed and the demanding timeframe for review of each plan, efficient coordination between the FWS Branch of Air Quality and the Assistant Secretary's (AS) Office will be required. The FWS received LA Regional Haze draft plan on November 21, 2007.

The FWS has completed the review of the LA plan and have drafted a cover letter with an enclosure that describes the comments in detail. Through a previous

Attachment 1

Comments of the US Fish and Wildlife Service on the BART Determination of ConocoPhillips Company – Alliance Refinery

The most significant emission units at the Alliance Refinery are in the process of being controlled through a 2005 EPA Consent Decree. The three units being controlled are the Fluidized Catalytic Cracker (for SO_2), Process Refinery Flares (for SO_2) and Crude Unit Heater (for NO_x). ConocoPhillips presents no basis for the statement in Section 2.1.4 of the Best Available Retrofit Technology (BART) determination which states, "All of these control requirements are considered more stringent than BART and are therefore considered to satisfy the regulatory requirements of the BART analysis." Such a statement cannot properly be made without documentation that a five-factor BART analysis was performed for each unit. Nothing in the EPA Guidelines for Best Available Retrofit Technology Determinations[1] excuses a source from performing the five-factor analysis, even though some significant level of control has been recently initiated. EPA precedent has confirmed that controls deployed under a Consent Decree do not supersede the need for deploying controls determined under a BART determination.[2] Therefore, the Regional Haze SIP should contain all the documentation to justify that the Consent Decree controls result in control of visibility impairing pollutants to a greater extent than BART. Nevertheless, it is noted that the controls being initiated are among the most stringent controls that would be considered in a BART determination for each of the three emitting units. If the Louisiana Department of Environmental Quality (LDEQ) concludes after a BART determination is performed that the control technologies in the Consent Decree are determined to be BART, then such a statement should be included in the Regional Haze SIP.

Since one of the statutory BART evaluation factors is cost-effectiveness, it is necessary that the annualized cost and cost per ton of each proposed control technology be thoroughly presented in the BART determination document.

Specifically, ConocoPhillips is proposing a wet gas scrubber for SO_2 control to be deployed in 2009 on the Fluidized Catalytic Cracker Unit; SCR for NO_x control to be deployed in 2008 on the Crude Unit Heater; and a yet-to-be-defined control technology with a control efficiency of at least 96.3% for SO_2 control for the Process Refinery Flares. The specific control technology for the Crude Unit Heater should be defined in the Regional Haze SIP. The wet gas scrubber for the Fluidized Catalytic Cracker is stated to reduce SO_2 emissions from 550.24 lb/hr to 275.12 lb/hr, showing 50% control efficiency. This technology is capable of significantly higher emission control, possibly 90%. This apparent deficiency in emission control should be explained, or a commitment should be made to a higher level of control. A five-factor BART analysis would likely generate a cost-effective technology with much higher control efficiency.

The Consent Decree mentioned above (Civil Action No. H-05-0285) is referenced but is not attached to the ConocoPhillips BART determination or the Regional Haze SIP. This document should be included as one of the appendices in the RHSIP.

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[1] See 40 CFR Part 51, Appendix Y The U.S. Environmental Protection Agency finalized it's BART Guidelines on June 15, 2005, and published the preamble and final rule text in the Federal Register on July 6, 2005. The rulemaking action added Appendix Y to Part 51, titled "Guidelines for BART Determinations Under the Regional Haze Rule."

[2] EPA, Region 8 Comments on Proposed BART Determination and Permit, signed by Callie A. Videtich, dated July 19, 2007, regarding Tri-State Generation and Transmission Association, Inc., Craig Station.

Attachment 2

Comments of the US Fish and Wildlife Service on the BART Determination of Sid Richardson Carbon Company, Addis Plant

The feedstock for this carbon black manufacturing company is 3% sulfur carbon black oil. This sulfur content is not improved upon by any other carbon black manufacturing facility, so Sid Richardson Carbon Company (Sid Richardson) considers this to be Best Available Control Technology (BACT). Likewise, Sid Richardson states that no other carbon black manufacturing facility deploys HEPA/ULPA or wet scrubbing that might be considered more efficient than the Sid Richardson fabric filters that are 99.923% efficient in collecting particulate matter, so this technology is considered BACT by Sid Richardson.

Sid Richardson has stated that no other carbon black manufacturing facility has deployed any SO_2 or NO_x control technology that might be used in the reactors, dryers or flairs. Thus, none of these technologies could be deemed to be technically feasible applications. However, the Degussa Engineered Carbons, LP carbon black plant in Baytown, Texas (Permit Number 9294) deployed a caustic scrubber for SO_2 control in the early 2000's. This demonstrates technical feasibility of a caustic scrubber on a carbon black plant. This portends that Sid Richardson (and/or Louisiana Department of Environmental Quality (LDEQ)) perform a Best Available Retrofit Technology (BART) determination that includes an SO_2 scrubber as an alternative control technology with a supporting cost analysis.

In summary, the current operating parameters of the Addis Plant that are declared to be BACT, which can be referred to as the "most stringent controls available,"[1] are as follows:

- Primary and Secondary Fabric Filters that are 99.923% efficient
- Good combustion control to limit NO_x formation in the dryers
- 3% sulfur carbon black oil as feedstock
- Use of pipeline quality natural gas for clean flairs

From the above declarations (with the possible exception of an SO_2 scrubber as noted above) LDEQ may choose conclude that the Sid Richardson Carbon Company, Addis Plant is operating with the most stringent controls available, which the EPA BART Guidelines deem to satisfy BART.

The LDEQ should formally acknowledge the assertions of the Sid Richardson Carbon Company, Addis Plant by documenting agreement with these operating conditions in the Regional Haze State Implementation Plan so as to make them federally enforceable.

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[1] See 40 CFR Part 51, Appendix Y. The U.S. Environmental Protection Agency finalized it's BART Guidelines on June 15, 2005, and published the preamble and final rule text in the Federal Register on July 6, 2005. The rulemaking action added Appendix Y to Part 51, titled "Guidelines for BART Determinations Under the Regional Haze Rule." The section of the guidelines referenced above (Section IV, D, Step 1, 9) appeared in the Federal Register at 70 FR 39165, July 6, 2005.

Attachment 3

Comments of the US Fish and Wildlife Service on the BART Determination of Rhodia, Inc. Sulfuric Acid Plant at Baton Rouge, LA

The subject BART Determination is deficient in considerable information that would be required for a third-party to corroborate the conclusions. Please supply the following information:

- A description of the current sulfur acid plants' equipment configuration and existing air pollution control equipment
- Spreadsheets itemizing equipment and construction costs of each of the BART alternatives
- Documentation to support each cost estimate, including vendor quotes, bid specifications and/or other authoritative information

The literature does not seem to support a claim that single contact, caustic scrubbing of tail gas can deliver 3-hour average emission limits of 3.0 pounds per ton of 100% H_2SO_4. An SO_2 to SO_3 conversion efficiency of the stated 94% would be expected to result in emissions of about 82 pounds per ton of product. Only a 99.7% conversion efficiency might yield 4.0 pounds per ton, 24-hour average, in an otherwise uncontrolled plant. This is the reason for the above request to supply information on existing control equipment. The literature suggests that this 99.7% level of conversion efficiency is attained only through the use of double-absorption technology. This is further evidenced by a review of the RACT/BACT/LAER Clearinghouse on EPA's webpage, where determinations issued during the last 10 years show only double-absorption process technology producing SO_2 emissions in the range of 3.5 to 4.0 pounds per ton of 100% H_2SO_4.

The BART determination does not supply an incremental cost analysis, instead citing that all the control alternatives have equivalent destruction efficiencies (approximately 94%). As discussed above, utilizing double-absorption alternative can achieve significantly greater destruction efficiency, (up to 99.7%). Therefore, an incremental cost analysis should be supplied.

Assuming the above premise that caustic scrubbing with 94% destruction efficiency does not result in adequate control, consideration should be given to the addition of a mist eliminator to the exit gases.

There is no mention of Continuous Emission Monitors being used as a method of compliance.

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

TAKE PRIDE IN AMERICA

Mike D. McDaniel, Ph.D, Secretary JAN 17 2008
Louisiana Department
of Environmental Quality
602 N. Fifth Street
Baton Rouge, Louisiana 70802

Dear Dr. McDaniel:

On November 21, 2007, the State of Louisiana submitted a draft implementation plan describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. The U.S. Fish and Wildlife Service (FWS) received and has conducted a substantive review of your draft Regional Haze Rule implementation plan, prepared in fulfillment of your requirements under regulations 40 CFR 51.308(i)(2).

We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent review of this plan. Please note that only the Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and therefore its ability to receive Federal approval from EPA.

As outlined in a letter to each State dated August 1, 2006, our review focused on eight basic content areas, which reflect priorities for the Federal land management agencies. In general, our review of the State of Louisiana's draft plan indicates a need to more completely address the land management agency priorities. However, the FWS Branch of Air Quality staff stands ready to work with you toward resolution of these issues. Note that we have highlighted comments in bold face that we feel warrant additional consultation prior to public release. We look forward to your response, as per section 40 CFR 51.308(I) (3). Specific questions regarding the review of and consultation on the draft plan may be directed to Mr. Tim Allen, FWS Branch of Air Quality, at (303) 914-3802.

Again, we appreciate the opportunity to work closely with the State of Louisiana and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

Sincerely,

Acting Assistant Secretary for
Fish and Wildlife and Parks

Enclosure

U.S. Fish and Wildlife Service Comments Regarding
Louisiana Draft Regional Haze Rule State Implementation Plan

On November 21, 2007, the State of Louisiana submitted a draft Louisiana State Implementation Plan (SIP) Revision for the Regional Haze Program, pursuant to the requirements codified in Federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS).

The air program staff of the FWS has conducted a substantive review of the Louisiana draft plan and provides the comments listed below. Our bold face comments described below warrant additional consultation prior to public release of the Louisiana Regional Haze Plan.

We are providing these comments to the State and wish them to be placed in the official public record. We look forward to your response as per section 40 CFR 51.308(i)(3), and we are willing to work with the Louisiana Department of Environmental Quality (LDEQ) staff towards resolving the major issues discussed in this letter. For further information, please contact Tim Allen with FWS at (303) 914-3802.

Overall Comments

The Fish & Wildlife Service has a significant concern that the information provided in the Louisiana SIP Revision for the Regional Haze Program fails to describe or address content elements required by the Regional Haze Rule. In reviewing the Louisiana draft SIP, the FWS has identified four elements that are deficient and in our opinion, does not meet the requirements for an approvable SIP. These elements are:

- **deficient analysis of reasonable progress and long term strategy for regional haze including the absence of an "Area of Influence" (AOI) or sub-RPO evaluation of reasonable control expectations;**
- **inadequate inter-state apportionment and consultation;**
- **deficient information regarding Best Achievable Retrofit Technology[1] (BART); and**
- **omission of established visibility goals, expressed in deciviews, for the 20% worst and 20% best visibility days at the Breton Wilderness Area.**

The State has relied, almost solely, on work completed by a contractor for the CENRAP Regional Planning Organization (RPO). The RPO work is based on regional controls and does not provide state specific progress goals. Louisiana has not adequately evaluated reasonable progress, nor developed a long term strategy specific to the Breton WA. The information supplied by the contractor can be used by Louisiana to develop the State's opinion and contains useful information that can be used to establish reasonable progress for the Breton WA. However, the information should not replace the State's obligation to

[1] BART-eligible sources are those sources that have the potential to emit 250 tons or more of a visibility-impairing air pollutant, were put in place or under construction between August 7, 1962 and August 7, 1977, and whose operations fall within one or more of 26 specifically listed source categories. Under CAA section 169A(b)(2)(A), BART is required for any BART-eligible source which "emits any air pollutant that may reasonably be anticipated to cause or contribute to any impairment of visibility in any such area."

evaluate reasonable progress factors and draw its own conclusions regarding reasonable controls.

The location of the Breton WA suggests that several States and Gulf emission sources likely contribute to visibility impairment. Louisiana has not adequately assessed the contribution of neighboring States and Gulf sources to visibility impairment at the Breton WA. An AOI evaluation and source apportionment demonstration is completely lacking and there is no evidence that information has been shared with neighboring States regarding their potential contribution to Breton.

The SIP does not provide enough information that fully describes the steps taken to evaluate BART. In addition, where BART is being established through other programs (i.e. consent decrees), the State must show that the final action results in controls that would be comparable to those achieved through a full BART evaluation.

The remaining comments below are organized according to the priorities that we presented in our August 1, 2006 letter.

Comments:

Baseline, Natural Conditions, and Uniform Rate

1. The plan discusses the issues surrounding the Breton IMPROVE site and the efforts to fill missing data. Recently, CIRA in connection with the IMPROVE committee, updated the basic current and natural conditions calculations using substitute data for stations with missing measurements. The most current results of these calculations are available on the CIRA/VIEWS website. Louisiana did not use these newly revised values and should incorporate them into their Regional Haze Plan.

Emission Inventories

2. Chapter 7 of the draft SIP narrative provides an overview of the emission inventories supporting the plan. However, comprehensive information describing the base year, performance, and future year inventory is not included as part of Chapter 7. Please provide more detailed information with respect to all inventories and the assumptions made with respect to their development. While some inventory information may be found in other portions of the plan, it should also be clearly summarized in the SIP narrative.

3. Table 7.1 and Table 7.2 provide summary emission levels for point, area, non-road, and on-road categories. Please provide more discussion regarding these emission levels. For example, do the numbers included in these tables represent emissions from sources in Louisiana or are they regional estimates?

   In addition, it is important to discuss how emissions are projected to change and the consequences of such changes on meeting the State's regional haze goals. For example,

the plan asserts that sulfur emissions are the primary visibility impairing pollutant, yet sulfur emissions associated with point and area sources are projected to increase.

4. The discussion in *Chapter 8: Modeling Assessment*, pertaining to model performance is contradictory and needs further explanation. For example, the plan states that the model performance for sulfate and organic carbon is "good". However, the model performance specific to Breton WA is described as "mixed" and over predictive of sulfates. This statement is contradicted by *Figure 8.1 Comparison of observed and 2002 Base G modeled daily extinction for Breton Island, Louisiana and Worst 20% days in 2002.* The figure indicates that sulfates are greatly under predicted when compared to Breton monitoring data. The modeling performance assessment should be clearly described, especially with respect to sulfates as they are identified as the primary visibility impairing pollutant of concern.

   In addition, Figure 8.1 references the inventory as "typ02g" or 2002 Base G. The performance modeling should be based on the performance inventory, not the base year inventory.

5. Section 8-5 describes the 2018 Base G modeling as including BART controls for Electric Generating Units (EGUs) located in Oklahoma, Arkansas, Kansas, and Nebraska. Please elaborate on what assumptions were made for BART in the 2018 Base G modeling for these states. For example, please specify if a presumptive level, some declared level, or no additional controls were assumed in 2018.

6. *Figure 8.2 URP Glidepath for 20% Worst and Best Days*, provides a graphical illustration of future model predictions versus the Uniform Rate of Progress. Please include a discussion describing "method 1 prediction." Are Relative Reduction Factors (RRFs) incorporated into these graphs? If RRFs are assumed, please provide a discussion of what these factors are and how they are integrated into glidepath predictions.

Area of Influence

7. The State does not provide information regarding AOI with respect to each Class I area that is influenced by Louisiana sources. The State has access to analyses produced by CENRAP and VISTAS that establish the significant source AOI for Class I areas in and near Louisiana. These geographical AOIs have been established by the RPOs to document the location of sources that have the highest potential to impair visibility at each Class I area. Through use of these AOIs, Louisiana has the opportunity to focus its 4 factor and reasonable progress analyses on the areas with the most significance for regional haze. In addition, all estimates of cost benefit (i.e. dollars per ton) should be based on these influential areas or with individual sources located within these AOIs.

8. The introduction of the plan, Page 1-4, refers to the use of the CALPUFF model in its analysis of Louisiana sources' impacts on Class I areas located in neighboring states. More detail should be provided with respect to this analysis and the sources that were

modeled, as well as a discussion of the conclusions drawn by Louisiana as a result of this analysis.

Best Available Retrofit Technology

9. On page 9-2, the plan states, "Consistent with the Guidelines, LDEQ did not evaluate emissions of Volatile Organic Compounds (VOCs) and ammonia in BART determinations..." Guidelines do require that the State evaluate ammonia and VOCs for BART. The State should consider either modeling these effects or provide an analysis on why these components are not significant contributors.

   Also, *Figure 9.1 CENRAP Modeled 20% Worst Days*, is said to illustrate that VOCs do not contribute significantly to light extinction at the various Class I areas, however VOCs are not included in the figure.

10. Please reconcile the information on page 9-4 with the information presented in *Figure 9.1 CENRAP Modeled 20% Worst Days*. The plan states that there are seven Class I areas that experience a modeled impact over 1.0 deciview from sources located in Louisiana. However, Figure 9.1 illustrates impacts at various Class I areas in terms of light extinction (Mm^{-1}). Please correlate these units, so that it is clear how Louisiana sources affect the evaluated Class I areas.

11. The BART discussion provided on pages 9-4 and 9-5 is confusing and needs further elaboration. The discussion of BART screening performed by the State seems to be a blend of modeled impacts of 0.5 deciview, development of an "artificial model", and an analysis of back trajectories. More information is needed to effectively describe methods used by the State in identification of the BART subject sources.

    For sources screened using an "artificial model" approach, a comparative analysis should be included to illustrate that the scenarios are "worst case." The plan needs to describe how the selected emission characteristics represent "worst case" conditions and how these conditions are indicators that sources at further distances will not have a higher impact.

12. The plan includes a list of BART sources, but no final decisions have been expressed. We are including, as attachments to this enclosure, comments specific to the three BART determinations included in Appendix G of the Regional Haze SIP.

13. Both Figures 9.4 and 9.6 are labeled *Bart Source CALPUFF Screening 2001*. Please clarify and also include a discussion explaining the information presented in Figure 9.4, Figure 9.5, and Figure 9.6.

Reasonable Progress Goals; Long Term Strategy

14. Chapter 10 of the plan describes Louisiana's reasonable progress goals toward improved visibility. The plan appears to rely entirely on the technical analysis of the CENRAP and

VISTAS RPOs. While the work of the RPOs is essential to individual States in developing regional haze plans, each state is required to analyze reasonable progress and perform a 4 factor analysis for their individual reasonable progress plans. Louisiana appears to have relied solely on the technical document supplied by a CENRAP contractor (Alpine Geophysics) and has not formulated a state specific plan for reasonable progress. While it is appropriate for a state to cite a technical analysis performed by an RPO, it does not constitute a complete analysis of reasonable progress for an individual state.

15. The State suggests that additional reductions would cost as much as $1696/ton. Again, this dollar amount is cited from a technical document supplied by an RPO contractor and is based on regional averages. However, the plan does not discuss why this dollar amount is not reasonable, nor does it explore other reduction options and associated costs. The plan should explore local reduction possibilities, specifically within an AOI, and fully evaluate cost effectiveness on a local scale. The obligation to perform a 4 factor analysis should not be limited to state or regional averages of costs for source categories or by specific pollutant.

16. The plan does not provide information with respect to the 20% cleanest days at Breton WA. The Regional Haze Rule requires that reasonable progress goals be established for protection of the 20% cleanest days at each Class I area, as well as improvement of the 20% dirtiest days.

17. Again, an AOI analysis is completely absent from the SIP. However, the SIP asserts that some RPO inventory estimates have double counted Gulf emissions at Breton WA, and implies that these emissions have significance. Since no apportionment of emissions by source category was provided by the State, the magnitude of the importance of Gulf emissions is unknown. This source category should be clearly described, as well as all other sources categories that contribute to visibility impairment at Breton.

Fire

18. The plan indicates that LDEQ does not have primacy with respect to smoke management plans therefore, does not provide information regarding smoke and its impact on Breton. It has been customary for the agency delegated to respond to regional haze requirements to work with their smoke management agency to develop information on how the State currently addresses or plans to address potential smoke impacts at Class I areas. If the State believes that smoke has little impact at Breton and will not impact visibility in the future, this information should be provided in the SIP.

Verification and Contingencies

19. The State suggests complete reliance on the IMPROVE monitoring network and does not describe alternative monitoring scenarios. The Regional Haze Rule is clear that states are ultimately responsible for monitoring in support of visibility protection. This is the case regardless of the availability of Federal funding for monitoring programs. Although we

share your interest in maintaining IMPROVE, the plan should provide additional discussion on alternatives to tracking regional haze progress.

Coordination and Consultation

20. In addition to establishing AOIs, the State should discuss and identify contribution of visibility impairing emissions from areas outside of Louisiana. This should include apportionment information developed by the RPOs regarding Mississippi, Alabama, and off shore Gulf emissions.

    The State should present apportionment information to neighboring states and the Gulf permitting authorities and provide information regarding consultation with these entities. Clearly identifying these attributions also will assist in future requirements to assess the progress towards natural visibility conditions Breton during the State's mid-term review process in 5 years.

21. On page 4-1, the plan states "Louisiana is committed to continue to coordinate and consult with the federal land managers (FLMs) during the development of future progress reports and plan revisions, as well as during the implementation of programs having the potential to contribute to visibility impairment in the mandatory Class I areas." The Regional Haze rule is clear that states should develop an on-going consultation plan as opposed to a general commitment. Please provide more detail regarding Louisiana's plan for continued consultation, such as timelines for future Regional Haze Plan revisions and coordination with FLMs on specific programs such as Prevention of Significant Deterioration/New Source Review.

United States Department of Agriculture | Forest Service | Ouachita National Forest | P.O. Box 1270 Hot Springs, AR 71902

File Code: 2580-2

Date: January 31, 2008

Mike D. McDaniel
Secretary
Department on Environmental Quality
P.O. Box 4301
Baton Rouge, LA 70821-4301

Dear Secretary McDaniel:

On November 21, 2007, the State of Louisiana submitted a proposed State implementation plan (SIP) describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. Technical appendixes that are referenced in the SIP were received from the State on November 26, 2007. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

The U.S. Department of Agriculture, U.S. Forest Service, received and has conducted a substantive review of your draft Regional Haze Rule implementation plan, which you are preparing in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). You have met your requirement to give the FLM 60 days to review. Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

As outlined in a letter sent to each State in October, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Manager agencies, and we have enclosed comments associated with these priorities. Note that we have highlighted comments in bold face that discuss what we consider to be major concerns of the proposed SIP that we believe warrant additional consultation prior to final adoption of the Louisiana Regional Haze Plan. The Forest Service air quality staffs stand ready to work with you towards resolution of these issues. We look forward to your response, per section 40 CFR 51.308(i)(3). For further information, please contact Judith Logan at (501) 321-5341.

Again, we appreciate the opportunity to work closely with the State of Louisiana and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

/s/Bill Pell
(for)Norman G. Wagoner
FOREST SUPERVISOR

Enclosure

cc: Chuck Carr Brown, Cheryl Nolan, Jennifer Mouton, Annette Sharp, Patrick Cummins, Guy Donaldson, Joe Kordzi, Chris Pease, Meredith Bond, Vivian Aucoin

Enclosure

Forest Service Technical Comments on Louisiana's Department on Environmental Quality (LDEQ) Draft Regional Haze State Implementation Plan (SIP)

Overall Comments

As stated in our letter, we appreciate the opportunity to work with your agency through the initial evaluation, development, and, now, subsequent review of this plan. To facilitate review, we have formatted in **bold** text those items that are of significant concern to the US Forest Service and we request additional consultation with LDEQ staff on these issues before final adoption of the Louisiana SIP.

Reasonable Progress and Long Term Strategy
The State cites a report submitted to CENRAP from Alpine Geophysics as the sole response to the mandatory four factor analysis and the conclusion of reasonable controls. The Alpine document provides general information in support of each State and makes suggestions of controls that should be considered. Although supportive, the report does not constitute a replacement to the State's obligation to evaluate the factors and to draw conclusions of controls that may be reasonable. This obligation should not be limited to State or regional averages of costs for all sources or by specific pollutant.

The State has access to analysis produced by CENRAP and VISTAS that establishes the significant source "areas-of-influence" (AOI). These geographical areas have been established by the RPOs to document the locations of sources that have the highest potential to impair visibility at each Class I area. Through use of these AOIs, the State has the opportunity to focus its 4 factor and reasonable progress evaluations to the most significant area. In addition, all estimates of cost benefit (i.e. dollars per ton) should be based on these areas or at individual sources within this area.

Inter-State Consultation
In addition to establishing AOIs, the State should discuss and identify contribution of visibility impairment emissions from areas outside the State of Louisiana. This should include apportionment information developed by the RPOs regarding Mississippi, Alabama, and off shore Gulf emissions.

The State should present consultation documentation on that apportionment with the other State and Gulf permitting authorities. Clearly identifying these attributions also assists in future requirements to assess the progress to Breton during the States mid-term review process in 5 years.

BART – Determinations
The State does not provide sufficient information to fully evaluate BART steps or provide a conclusion on the sources requiring BART determinations. In cases where BART is being established through other programs (i.e. consent decree), the State must

show that the final action results in controls that would be at or better than those achieved through a full BART evaluation.

Due to the proximity of Breton, discussion of BART controls may extend into other permitting control areas and should be identified in the BART section and followed through inter-State consultation.

Executive Summary
Page ES-2, paragraph 3. LA states that CALPUFF modeling, assumed to be conducted by LA on a source-by-source basis, shows the facilities in central and Northern LA bear no impact to visibility at Caney Creek Wilderness. However, LA does not indicate if these sources have a significant, cumulative impact, and whether these specific sources should be considered under reasonable progress.

Chapter 1: Background on the Regional Haze Rule
Page 1-4, Section 1-3, paragraphs 4 & 5. LA states that during triennial reviews, emission inventories of LA's stationary sources with 100 km of Breton have been performed. LA is praised for including point sources within Mississippi as part of their 2003 triennial review. However, in future reviews associated with LA's proposed long term strategy, the Forest Service requests that emission inventories from stationary sources within 300 km of Breton be reviewed from all states for potential visibility impacts to Breton.

Page 1-4, Section 1-4. While this section states that 40 CFR Section 51.308(d) directs each state to address regional haze for Class I areas both inside and outside its political boundaries, facilities in central and Northern LA are deemed by LA to be not responsible for visibility impacts to Class I Areas outside LA. CALPUFF modeling is cited with little reference. CALPUFF modeling in support of BART modeling does not present a convincing case.

Chapter 2: General Planning Provisions

Chapter 3: Regional Planning

Chapter 4: State, Tribe and Federal Land Manager Consultation
Page 4-1, LA states, "Louisiana is committed to continue to coordinate and consult with FLMs...". The rule suggests that States develop an on-going consultation plan as opposed to the simpler commitment. Please provide more information on topic and time line regarding Louisiana's continued consultation process with states, tribes, and FLMs through the regional haze review and revision process.

Chapter 5: Assessment of Baseline and Estimate of Natural Conditions in Class I Areas
Page 5-1. Discussion is provided regarding missing data from the Breton IMPROVE site. A process is described to back-fill missing data from other non-missing locations through the use of a contractor. Recently, CIRA in connection with the IMPROVE

committee updated basic current and natural calculations using substitute data for station with missing data. The most current values of these calculations are presented on the CIRA/VIEWs website. Because LA and CIRA/VIEWs data may be different, LA should review and potentially adopt the new figures.

Chapter 6: Monitoring Strategy

Section 6.1, page 6-2, paragraph 3. LA suggests that an IMPROVE monitor to replace that destroyed by Hurricane Katrina be relocated to a site near Lake Catherine, St. Bernard Parish, over 80 km from Breton, by January, 2008. LA should include a summary of its analysis to chose this location, and conduct a similar analysis to locate the IMPROVE monitor in closer proximity to Breton, including an unprecedented option to locate the monitor near Gulf Port, Mississippi, approximately half the distance to Breton relative to the Lake Catherine site.

Section 6.2, page 6-4. The State suggests a complete reliance on the IMPROVE monitoring network with no description of alternative monitoring efforts or utilization of substitute data. The Regional Haze Rule implies that states are required to track progress regardless of the status of federally funded monitoring programs. Although we share LA's interests in maintaining IMPROVE, LA should still provide additional discussion and alternatives on tracking regional haze progress.

Chapter 7: Emission Inventory

This chapter on emission inventory provides good definition information but falls short of a comprehensive summary of the resulting final inventories used in support of the SIP. Some information provided in the modeling section goes into more detail about the performance, base and future inventories. This type of discussion should be included in Chapter 7, and provide a comprehensive summary without the need to fully investigate the highly technical appendix D.

Section 7.1, page 7-1, paragraph 2. The Forest Service understands that the reference to four general categories of emission sources relates to anthropogenic sources. However, to the casual reader, without some reference to biogenic emissions within the Overview Section, the existing reference may not be complete enough in relation to the section devoted to biogenic sources later in the Chapter.

Page 7-3, Table 7.1 and Table 7.2. These tables provide very basic data on emission levels with little to no discussion. It would be important to address whether data provided represents LA specific or regional levels and why, if sulfur emissions are discussed throughout the draft document as the primary visibility pollutant, that projections of sulfur emissions or going up overall. It is especially interesting that point and area sources of sulfur are on the increase. Also, biogenic emissions should also be included in these tables for completeness and ease of comparison.

Chapter 8: Modeling Assessment

Section 8.3, page 8-2. As stated before, the emission inventory subsection of 8.3 provides more specific information about inventories than the inventory chapter but still lacks

sufficient detail to summarize the final inventories used in support of the SIP.

Section 8.4. Sulfate and organic carbon performance is termed good on page 8.3. However, on page 8-4, the Breton performance is described as "mixed" and sulfate performance as "...almost always greatly over predicted." These descriptions are confusing and inconsistent, and should be reconsidered. This is followed by figure 8-1 on page 8-5 that appears to contradict the statements by showing model predictions as almost always greatly under predicting when compared to monitored values, leading to the possibility that utilizing controls as proposed in the draft SIP, may leave Breton farther from the URP in 2018 than predicted. The figure also references use of the "typical 02g" inventory when model performance should be looking at the "performance" inventory.

Page 8-6. LA does not identify which version of IPM is utilized. It is assumed either version 3.0 or 2.1.9 was utilized. This should be clarified.

Page 8.6. It is stated that CAIR and EGU BART controls from Oklahoma, Arkansas, Kansas and Nebraska were included in Base G model simulations. LA should clarify if these BART determinations have been made (presumptive or a declared level) or whether BART as proposed has no additional controls. This information source does not appear in the consultation section.

Page 8-7, Figure 8.2. This figure with associated text provides a comparison of future model prediction vs. the Uniform Rate of Progress. LA should describe what "method 1 Prediction" means, and provide a thorough discussion on the use of RRFs that we assume are incorporated in these graphics.

Chapter 9: Best Available Retrofit Technology (BART)

Section 9.1, page 9-2. LA states that "Consistent with Guidelines, LDEQ did not evaluate emissions of VOC and ammonia in BART..." The guidance suggests alternative methods for addressing VOCs and ammonia other than CALPUFF modeling but does suggest addressing these pollutants. Please expand your discussion on why VOCs and ammonia would not need further evaluation.

Section 9.3, page 9-4. LA states, "Modeling results shown in Figure 9.1 indicate that there are seven Class I areas that experience an impact over 1.0 deciview..." However, Figure 9.1 is a graph of extinction in inverse megameters at Breton alone. The seven Class I areas impacts at over 1.0 dv are listed later in this Section.

Pages 9-4 & 9-5. The discussion to provide an initial screening to BART sources is a blend of a minimum 1dv impact, development of an "artificial model", and analysis of trajectories to determine significance. These may have no basis in BART. The artificial model approach may be significance, but too little information is presented to confirm that. Also, please indicate the coordinates of the source used in the "artificial model."

Pages 9-7 & 9-8. Supplementary artificial model examples are presented and used to

eliminate BART eligibilities. Please provide additional information to support this inclusion, including discussion on how selected emission characteristics represent "worst-case" scenarios, and would prevent examples of more distance sources from showing higher impacts than the example set. Also, because the back trajectories in Figures 9.2 and 9.3 indicate even one day residence within LA corresponding to the 20% worst days, it is not reasonable to conclude that those BART facilities in LA show no impact to either Sipsey or Mammoth Cave.

Page 9-11, Table 9.4. This table shows facilities subject to BART. However, no BART decisions are presented by LA.

Page 9-14, Figure 9.6 appears to be a repeat of Figure 9.4. A 2003 based figure is likely.

Chapter 10: Reasonable Progress Goals

Section 10.2, page 10-3. It is suggested that Appendix H shows that essentially OTW/OTB plans are reasonable for Louisiana. The Appendix represents a contractor's opinion/recommendation on the broad CENRAP area. It is appropriate for LA to cite portions of the document, but it can not constitute a response to reasonableness onto itself.

Page 10-4, It is suggested that control costs for it would be as low as $1696/ton reduction. However, it is not clear whether LA is referring to NO_x or SO_2 reductions. LA makes no statement of why this is not reasonable. Did the State conduct any source or category specific analysis on cost/benefit? Please provide analyses for in-state facilitites.

Chapter 11: Long-Term Strategy

Page 11-2. LA suggests that models are used in a relative sense. As requested, please provide a discussion in an appropriate section about use of RRFs.

Section 11.4, page 11-3, paragraph 3. LA stated that "ongoing air pollution control programs were sufficient to meet RPGs through 2018." Based on previous comments, this statement has not been demonstrated.

Page 11-3, paragraph 4. LA suggests that LDEQ does not have primacy with smoke management plans, and therefore needed information in not provided in the draft SIP. It has been customary in other states for the agency delegated to respond to regional haze requirements to work with their smoke planning agency to include information on how the State currently addresses or plans to address the potential effects of visibility impairment at Class I areas due to smoke. Does the plan treat Class I areas as sensitive receptors to smoke, and if so, how will potential visibility impacts be addressed?

Page 11-4. LDEQ makes statements about double counting of Gulf emissions on Breton. This clearly implies that Gulf emissions have significance. The State provided no information on emission apportionment from off-shore sources. This source category is poorly described by the RPO or LA, yet appears to be significant. Please include a more

thorough discussion regarding Gulf emissions.

Chapter 12: Comprehensive Periodic Implementation Plan Revisions and Adequacy Determinations

The Forest Service requests that LA include a statement in this Chapter committing to future consultation with the FLMs.

Comment Summary Response:

EPA Comments

1. **Comment**: EPA in submitting the comments on the draft document reserved the right to address additional concerns that were not discovered during the 60+ day comment period provided due to time constraints.
   Response: Louisiana believes that the Regional Haze SIP is an ongoing project to reach the mandated goal of pristine natural visibility by 2064. As such, Louisiana welcomes comments at any time but reserves the right to include answers to comments in the 5 year review as the data available at that time may make the concern moot.

2. **Comment:** The SIP contains a citation error at the top of page ES-3 of the executive summary, and at the top of page 2-1 of chapter 2, in which Section 51.308(e) is incorrectly referenced as Section 50.308(e).
   Response: This citation error has been corrected.

3. **Comment:** LDEQ should ensure, with the submittal of the final SIP, demonstrates it has followed the requirements of Appendix V to Part 51. Region 6 also suggests that LDEQ edit the paragraph "Public Notice" on page 2.1 to include a reference to Appendix V of Part 51. Lastly, Region 6 suggests documentation showing that Louisiana complied with Appendix V of Part 51 be included in SIP Appendix A (Public Notice and Participation) of the final SIP submittal.
   Response: LDEQ has complied with every aspect of the public notice and hearing components of Appendix V of Part 51. A copy of all required documents is included in Appendix A as required of the final document.

4. **Comment:** In general, LDEQ should ensure that it has specifically addressed each requirement of Section 51.308, even if it feels specific requirements do not apply or appear to be self evident. It is suggested that a checklist be used for this purpose.
   Response: LDEQ has made every attempt to respond to each of the requirements. A copy of the checklist provided by Region 6 to the CENRAP States is included in Appendix J.

5. **Comment:** All graphs and charts with color coded lines and bars should be reproduced in color, as black and white reproduction does not allow the identification of the individual items. This should be ensured in both the printed and electronic versions of the SIP, including all appendices.
   Response: LDEQ has complied with this request.

6. **Comment:** In Chapter 4, LDEQ cites Section 51.302(b)(2) when it references its obligation to consult with the Federal Land Managers instead of 51.308(i).
   Response: This citation error has been corrected.

7. **Comment:** LDEQ should change the font on page 5-3 concerning the light extinction algorithms to make it more readable.
   Response: LDEQ has tried to comply with this request, albeit to no avail. We apologize for the inconvenience.

8. **Comment Part 1:** EPA suggested that since the model used substituted data from the Gulfport MS site, that LDEQ should explore the possibility of using something other than the application of a single linear correlation between the Gulfport and Breton data. EPA feels that the correlations could then be used to construct conservative data, which would then be averaged to obtain the current conditions.
   Response Part 1: All parties concerned, including LDEQ, EPA, FLMs and CENRAP modelers, discussed the possibilities at the time the model runs were made and agreed that this approach was the best suited at the time.

   Comment Part 2: LDEQ should also consider using the updated analysis that CIRA recently conducted with the IMPROVE committee that updated natural conditions using substituted data for missing measurements.
   Response Part 2: LDEQ acknowledges the problem of having weak monitoring data. With the submission of the 5-year report, LDEQ commits to review the calculation of current conditions, reconstruct the uniform rate of progress, and proactively make all assessments required under 40 CFR 51.308(g) and (h), including a diligent re-assessment of the reasonable progress goals as required by 51.308(h)(3) and (4).

9. **Comment:** LDEQ should provide more documentation than the summary presentation of the Breton/Gulfport data substitution exercise and the resulting calculations of the baseline conditions contained in Appendix C. This should include actual spreadsheets, calculations, worksheets, etc used to support this calculation.
   Response: See response to Comment 8.

10. **Comment:** On page 5-4, LDEQ states that the new IMPROVE equation was used to construct the natural visibility condition. Although Appendix B was referenced, no information was found there that supports this calculation. LDEQ should supply any spreadsheets, calculations, worksheets, etc. used to support his calculation.
    Response: The CENRAP contractor originally calculated natural background for Breton. The spreadsheets, calculations, worksheets, etc. were never supplied to any of the CENRAP states. A spreadsheet which illustrates the steps the contractor used can be found at the end of this document.

11. **Comment:** LDEQ should indicated how it will satisfy Section 51.308(d)(4)(v), which states "the implementation plan must provide for the reporting of all visibility monitoring data to the Administrator at least annually for each mandatory Class I Federal area in the state. To the extent possible, the State should report visibility monitoring data electronically."
    Response: LDEQ reports all monitoring data to EPA as required by 40 CFR 58.16. LDEQ has no operational control over this IMPROVE monitor. This monitor is operational under the control of the Department of the Interior. The Interior should report annually to the Administrator.

12. **Comment:** The following two comments deal with Section 51.308(d)(4)(v) concerning the Emissions Inventory (EI) data—

    (a) It appears that all the EI data in the above webpage that pertains to the RH SIP is also included in the RH SIP as Appendix D. This text within Chapter 7 should therefore just reference Appendix D. The tables in Chapter 7 are unclear to the area/region that the emissions summaries are compiled. It would be helpful to have tables for just Louisiana to evaluate in Chapter 7 (Including base case 2002, baseline 2002 and 2018).

Response: The model used 2002 actuals for the stationary-point-source inventories which were provided by the individual states. The EI used was statewide for Louisiana. Similarly, the tables in Chapter 7 reflect 2002 Emissions Inventory for Louisiana.

(b) In addition to the baseline year and projected EI data, section 51.308(d)(4)(v) requires the EI, "include emissions for the most recent year for which data are available…The state must also include a commitment to update the inventory periodically." LDEQ should indicate how it has satisfied these requirements and where in its SIP this information can be found.

Response: Louisiana follows Federal rule by complying with CERR and AERR reporting requirements. According to EPA, the purpose of CERR is to simplify reporting; the pollutants reported include SOx, VOC, NOx, Co, Pb, PM10, PM2.5 and NH3. Updates for point sources are reported annually with the first year's data being 2002; updates for area, onroad mobile, nonroad mobile and biogenics are reported on a triennial basis. This reporting scheme will allow all data to be quality assured prior to use in the midcourse reports and 10 year revisions.

13. **Comment:** LDEQ should indicate how it has addressed Section 51.308(d)(4)(vi), which requires the SIP provide for "other elements, including reporting, recordkeeping, and other measures, necessary to assess and report visibility."
Response: Louisiana complies with the PSD requirements for new and modified sources through LAC 33:III.509.P.—Sources Impacting Federal Class I Areas—Additional Requirements.

14. **Comment:** On page 10-4, LDEQ references Appendix I as containing the notes from its consultation meetings. LDEQ should demonstrate how this information satisfies Section 51.308(d)(1)(iv). Region 6 is particularly interested in how this consultation may have informed LDEQ's reasonable progress goal.
Response: Throughout the RH SIP process, LDEQ participated in meetings with CENRAP, VISTAS, EPA, and the FLMs to discuss the AOI surrounding Breton. There were many discussions on the use of substitute data as well as what the regulated areas could do to reduce emissions that cause visibility impairment. These meetings set the course on how LDEQ would begin to develop a control strategy toward the 2064 Visibility Goal through state and national program development.

15. **Comment:** Section 51.308(d)(3)(v) requires that LDEQ consider, at a minimum, certain factors in developing a long term strategy. In general, LDEQ addressed these requirements by making short statements which do not appear to demonstrate these factors were carefully considered. The following comments provide more specifically:

(a). On page 11-3, in response to the requirement of Section 51.308(d)(3)(v)(C) that LDEQ consider emission limitations and schedules for compliance to achieve its reasonable progress goal, LDEQ states that ongoing pollution control programs were sufficient to meets its reasonable progress goals through 2018. LDEQ should provide a technical justification.
Response: See discussion added in Chapter 11, Section 11.3 Weight of Evidence.

(b). On page 11-3, in response to Section 51.308(d)(3)(v)(B), which requires LDEQ to consider measures to mitigate the impact of construction activities, Louisiana states it may require visibility monitoring in any Class I area where preconstruction and post-

construction of any new source or major modification may have an adverse impact on visibility in any Class I area.
Response: Louisiana issued Emergency Orders which allowed for repair; however if the unit had to be replaced, the facility was required to proceed with the normal permitting requirements. This would include PSD determinations for visibility impairment.

(c.) Section 51.308(d)(3)(v)(D) requires that LDEQ consider source retirement and replacement schedules in constructing its long term strategy. LDEQ should demonstrate how it specifically considered these criteria in developing its long term strategy, particularly where these schedules would have a significant impact on regional emission loadings and on a State's ability to achieve reasonable progress goals.
Response: The statutory factor of the remaining useful life of the source is applicable only to those measures which would require retrofitting of control devices at existing sources. Louisiana's long term strategy does not include the promulgation of any new rules which would cause the retrofitting of control devices at this time.

(d). LDEQ should demonstrate how it has met Section 51.308 (d)(3)(v)(C) which requires that Louisiana consider emissions limitations and schedules for compliance to achieve the reasonable progress goal.
Response: Louisiana relied on the CAIR emission reductions of SO2 and NOx; the SO2 and NOx reductions that would be gained from the National Refinery Initiative; the SO2 reductions gained from the consent decree with Rhodia; and the national rules that have been implemented or will be implemented during the next 10 years. Certainly if EPA believes that the national programs are enough to bring most of the continental United States into attainment for ozone by 2020, they also believe that the reductions will gain much in the way of combating visibility impairment. More specific language has been incorporated into Chapter 11, Long Term Strategy.

(e.) Section 51.308(d)(3)(V)(E) requires that Louisiana consider smoke management techniques for agricultural and forestry management purposes; consequently, the Louisiana RH SIP should do one of the following:

i.) demonstrate through source apportionment or other methods that fire emissions are not a significant contributor to visibility impairment at Breton.

ii.) Institute smoke management practices or techniques that reduce are fire emissions within the state.

Response: LDEQ is actively participating in a workgroup to develop a comprehensive smoke management plan for the State of Louisiana. The plan will be developed in accordance with the EPA's Interim Air Quality Policy for Wildland and Prescribed Fires. We hope to have a plan in place by the end of the year 2008.

16. **Comment:** Section 3-7 of Appendix B discusses model performance evaluation of the 20% best and worst days. LDEQ should explain how it has accounted for this level of modeling performance in its regional haze demonstration and how this may have been incorporated into LDEQ's reasonable progress determination.
Response: The department acknowledges poor model performance. While the CENRAP contractor was reporting modeling results, LDEQ was concerned with poor model performance for the Breton area but it did not then nor does it now have the resources to remodel ourselves. That part of uncertainty that resulted from this poor modeling performance in addition to poor

monitoring data is the reason why the LDEQ regional haze SIP postpones the decision to impose controls that may or may not address visibility issues at Breton until the next midcourse review.

17. **Comment:** Region 6 cannot determine where LDEQ has addressed Section 51. 308(d)(3), which requires "the long term strategy must include enforceable emission limitations, compliance schedules, and other measures as necessary to achieve the reasonable progress goals established by States having mandatory Class I Federal areas".
    Response: In this SIP, since the projected 2018 visibility is just above that on the glideslope and current poor model and monitoring performance, the long range strategy is to reassess visibility at the midcourse correction and also at 2018.

18. **Comment:** On page 11-4,LDEQ does not discuss how it satisfies the requirements of Section 51.308(d)(3)(v)(G), the anticipated net effect on visibility due to projected changes in point, area, and mobile source emission over the period addressed by the long term strategy.
    Response: Although the department does not believe that the Alpine Geophysics analysis in Appendix H of the SIP is reflective of the current situation in Louisiana, with the refinery initiative consent decrees and the consent decree at Rhodia, it does believe that these reductions along with the reductions due to CAIR will reduce visibility impairing pollutants thus improving visibility, the amount of improvement is uncertain.

19. **Comment:** LDEQ should specify within its SIP that it will submit its SIP revisions, five year report and SIP adequacy determination by dates certain as specified in Section 51.308(f), (g) and (h).
    Response: LDEQ has included a table in the SIP which outlines these dates.

20. **Comment:** LDEQ should ensure that it includes in its final SIP a description of how it addressed any comments provided by the FLMs, as required by Section 51.308(i)(3).
    Response: LDEQ has included in its comment and response summary those comments addressed by the FLM. Further, LDEQ participated in a telephone conference on November 5, 2007, during which the department and participants discussed each comment individually. The FLMs were given every courtesy afforded by the Clean Air Act. A copy of the comments is included in Appendix A, Public Notice and Participation.

21. **Comment:** LDEQ should include in its SIP procedures for continuing consultation between the State and FLMs as required by Section 51.308(i)(4).
    Response: LDEQ has included specific procedures for continuing consultation in Section 2.4 of the final SIP document.

Forestry Comments:

1. **Comment:** Louisiana does not indicate if sources in central and northern Louisiana have a significant cumulative impact on visibility at the Caney Creek Wilderness Area; further, LDEQ does not indicate whether or not these specific sources should be included under reasonable progress.
   Response: The year 2018 CENRAP CAMx source apportionment (PSAT) modeling analysis, see Figure 9.4, indicates the Class I areas potentially impacted by emissions from all of Louisiana facilities. The impact at Caney Creek is just above 2 $Mm^{-1,}$, which is low. Central Class I Areas Consultation Plan which included Caney Creek did not name Louisiana sources as having an

impact on visibility at Caney Creek. Therefore Caney Creek impacts were not included in the reasonable progress section.

2. **Comment:** Page 1-4, Section 1-3, paragraphs 4&5—Request by the US Forest Service that emission inventories from stationary sources within 300 km of Breton be reviewed from all states for potential visibility impacts to Breton.
   Response: Louisiana will follow protocol or official guidance when assessing visibility impacts on Breton or Caney Creek. Louisiana will continue to request emissions inventory information from those states in the area of influence; however it has control of only Louisiana.

3. **Comment:** CALPUFF modeling does not present a convincing case (in support of BART modeling) when discussing visibility impacts to Caney Creek Wilderness Area.
   Response: The section was rewritten.

4. **Comment:** Please provide more information on the consultation plans and time line regarding Louisiana's continued consultation process with States, tribes, and FLMs through the regional haze review and revision process.
   Response: See commitment in Section 2.4

5. **See Comment 8, Part 2 in first section (EPA comments)**

6. **Comment:** Section 6.1, page 6-2, paragraph 3—LA suggests that an IMPROVE monitor to replace that destroyed by Hurricane Katrina be relocated to a site near Lake Catherine, St. Bernard Parish, over 80 km from Breton by January 2008. LA should include a summary of its analysis to chose this location, and conduct a similar analysis to locate the IMPROVE monitor in closer proximity to Breton, including an unprecedented option to locate the monitor near Gulf Port MS, approximately half the distance to Breton relative to Lake Catherine.
   Response: Louisiana does not have jurisdiction of the IMPROVE monitor. This is a federal program run by the IMPROVE Steering Committee, of which the Forest Service is a member.

7. **Comment:** Louisiana should provide additional discussion and alternatives on tracking regional haze progress besides the IMPROVE network.
   Response: See comment 11, EPA

8. **Comment**: Chapter 7, Emissions Inventory, should include a comprehensive summary without the need to fully investigate the highly technical appendix D.
   Response: Tables 7-1 and 7-2 provide a summary of the emission inventory.

9. **Comment:** Emissions Inventory tables 7-1 and 7-2 should include biogenics for comparison.
   Response: See comment 12, EPA

10. **Comment:** Wants biogenic emissions included in tables 7-1 and 7-2
    Response: LDEQ provided emission summaries on those emissions that can be reduced through control strategies. Biogenics do not fit the category and therefore will not be included.

11. **Comment:** Did the state conduct any source or category specific analysis on cost/benefit? Please provide analyses for in-state facilities.
    Response: See attached work sheet for comment on cost of controls in Appendix K.

12. **Comment:** LDEQ suggests that models are used in a relative sense. As requested, please provide a discussion in an appropriate section about use of RRFs.
    Response: The sentence in section 8.5 **referring** to models being used in a relative **sense** has been removed. The CENRAP contractor originally calculated baseline visibility, average baseline deciviews for the worst and best days, relative response factors, etc. for Breton. The only results supplied to any of the CENRAP states is the Technical Support Document (TSD) at appendix B. A discussion of using models in a relative sense is not included in the TSD. Nor are baseline visibility calculations, average baseline deciviews for the worst and best days, relative response factors, etc. for Breton.

13. **Comment:** Section 11.4, page 11-3, paragraph 3—Louisiana stated that "ongoing air pollution control programs were sufficient to meet RPGs through 2018." Commenter believes this statement has not been demonstrated.
    Response: LDEQ believes that the national and state control strategy, coupled with the consent decree reductions will likely provide the state's apportionment of emission reductions to meet the 2018 mark. Poor CENRAP model performance for Breton and incomplete monitoring data makes analytical demonstration currently impossible.

14. **Comment:** Page 11-4 –Please include a more thorough discussion regarding Gulf emissions.
    Response: Gulf emissions include marine vessels and offshore platforms. An attempt was made to capture these in the CAMx source apportionment runs. See Section 2.11 MMS Off-shore Gulf of Mexico Emissions, 2.12, Off-shore Shipping Emissions, and 5.4 PM Source Apportionment Modeling in the Technical Support Document.

FLM Comments

15. **Comment:** Louisiana did not use the newly revised values and should incorporate them into their RH SIP.
    Response: See Comment 8b, EPA

16. **Comment:** Please provide more detailed information with respect to all inventories and the assumptions made with respect to their development. While some inventory information may be found in other portions of the plan, it should also be clearly summarized in the SIP narrative.
    Response: See Comment 12, EPA

17. **Comment:** Do the numbers in Tables 7.1 and 7.2 represent emissions from sources in the state or are they regional estimates.
    Response: Emissions inventory summaries are for Louisiana only.

18. **Comment**: Discuss how emissions are projected to change and the consequences of such changes on meeting the state's regional haze goals. For example, the plan asserts that sulfur emissions are the primary visibility impairing pollutant, yet sulfur emissions associated with point and area sources are projected to increase.

Response: The contractors grew the emissions inventory using EPA approved methods. These methods predicted an increase in sulfur emissions; however, LDEQ has provided an emissions inventory for point sources from 2003-2006 which shows a decrease in sulfur. With the onset of CAIR and the ULSD national rule, these emissions should continue to decrease. See Appendix K.

19. **Comment:** The modeling performance assessment should be clearly described especially with respect to sulfates as they are identified as the primary visibility impairing pollutant of concern.
    Response: The modeling performance is described in 3.7.3 Breton Island (BRET), Louisiana in the Technical Support Document. The CENRAP contractor assessed model performance. Detailed information other than that in the technical support document was not supplied to the department.

20. **Comment:** Please specify if a presumptive level, some declared level, or no additional controls were assumed in 2018.
    Response: The technical support document on page reads "on the books" control strategies. The department believes this means the controls listed on page 11-2 and 3 of the SIP.

21. **Comment:** Figure 8.2 *URP Glidepath for 20% Worst and Best Days*, provides a graphic Illustration of future model predictions versus the URP. Please include a discussion describing "method 1 prediction". Are Relative Reduction Factors incorporated into these graphs? If RRFs are assumed, please provide a discussion of what these factors are and how they are integrated into Glidepath predictions.
    Response: Section 8.5 of the plan indicates that the uniform rate of progress glide paths were produced by drawing a line from the baseline observed visibility conditions for the 20 percent worst days to natural visibility conditions in 2064. Neither model output nor relative reduction factors were used in the construction of the glide paths. Therefore, no changes were made to the plan regarding how uniform rate of reasonable progress glide paths were produced.

22. **Comment:** AOI not addressed:
    Response: The AOI in the Alpine Geophysics is addressed in Section 10.

Bart comments on the Regional Haze SIP

FLM and Forestry

1. **Comment:** On page 9-2, the plan states, "Consistent with the Guidelines, LDEQ did not evaluate emissions of VOC and ammonia in BART determinations…" Guidelines do require that the state evaluate ammonia and VOCs for BART. The state should consider either modeling these effects or provide an analysis on why these components are not significant contributors.

Response: The department agrees with the comment. A short analysis of BART VOC and ammonia emissions related to total VOC and ammonia emissions was added to the BART discussion.

a. Also, figure 9.1 Cenrap Modeled 20% Worst Days, is said to illustrate that VOCs do not contribute significantly to light extinction at the various Class I area, however VOCs are not included in the figure.

   Response: The department agrees with the comment. Figure 9.1 was removed and replaced by 3 figures exhibiting the Breton monitoring data which indicates ammonium sulfates to be the predominate contributor to light extinction at Breton.

2. **Comment:** Please reconcile the information on page 9-4 with the information presented in Figure 9.1. The plan states that there are 7 Class 1 areas that experience a modeled impact over 1.0 deciview from sources located in Louisiana. However, 9.1 illustrates impacts at carious Class I areas in terms of light extinction (Mm^{-1}). Please correlate these units, so that it is clear how Louisiana sources affect the evaluated Class I areas.

   Response: The department agrees with the comment. Figure 9.1 was renamed figure 9.4 and the text now indicates impacts at various Class I areas in terms of $Mn^{-1.}$

3. **Comment:** The BART discussion provided on pages 9-4 and 9-5 is confusing and needs further elaboration. The discussion of BART screening performed by the state seems to be a blend of modeled impacts of 0.5 deciview, development of an "artificial model" and an analysis of back trajectories. More information is needed to effectively describe methods used by the State in identification of the BART subject sources.

   Response: The department agrees with the comment and that section has been rewritten.

   a. For sources screened using an "artificial model" approach, a comparative analysis should be included to illustrate that the scenarios are "worst case". The plan needs to describe how the selected emission characteristics represent "worst case" conditions and how these conditions are indicators that sources at further distances will not have a higher impact.

      Response: The department agrees with the comment and a sentence has been added to indicate that the stack height is more than twice that of any other Louisiana BART source that is closer to Class 1 areas to the north and west.

4. **Comment:** Pages 9-7 & 9-8: Supplementary artificial model examples are presented and used to eliminate BART eligibilities. Please provide additional information to support this inclusion, including discussion on how selected emission characteristics represent "worst –case" scenarios, and would prevent examples of more distance sources from showing higher impacts than the example set. Also, because the back trajectories in Figure 9.2 and 9.3 indicate even one day residence within LA corresponding to the 20% worst days, it is not reasonable to conclude that those BART facilities in LA show no impact to either Sipsey or Mammoth Cave.

   Response: The department agrees with the comment. Figures 9.2 and 9.3 have been removed and replaced with VISTAS supplied residence times and are influence charts indicating no Louisiana facility impact at either Sipsey or Mammoth Cave.

5. **Comment:** The plan includes a list of BART sources, but no final decisions have been expressed. We are including comments specific to the three BART determinations included in Appendix G of the RH SIP.
   Response: The department agrees with the comment. Language has been included that reads that the department has approved the BART determinations and the proposed controls will be included in air permits.

6. **Comment:** Both figures 9.4 and 9.6 are labeled BART Source CalPUFF Screening 2001. Please clarify and also include a discussion explaining the information presented in Figure 9.4, 9.5 and 9.6.
   Response: The department agrees with the comment. Figure 9.6 was inadvertently repeated, the 2003 figure has been added. Figures 9.4, 9.5, and 9.6 have been renamed figures 9.9, 9.10, and 9.11 and a sentence describing the information in these figures has been added.

7. **Comment:** The state does not provide sufficient information to fully evaluate BART steps or provide a conclusion on the sources requiring BART determinations. In cases where BART is being established through other programs (i.e. consent decree) the state must show that the final action results in controls that would be at or better than those achieved through a full BART determination.
   Response: The department does not agree with the comment. 40 CFR 51 Appendix Y includes guidelines for determining the costs of compliance for BART controls. The Guidelines do not specifically address how to determine the costs of compliance when a facility is subject to a consent decree. The department assumed that the costs required by the consent decree were solely associated with the consent decree and this implied that the same costs associated due to a BART requirement were then $ 0. Thus, for ConocoPhilips, the cost effectiveness was the reduction of 6300 tons of visibility impairing pollutants at a cost of $0. For Rhodia, the cost effectiveness was the reduction of 9000 tons of visibility impairing pollutants also at $0.

   Looking at this in a completely different way, EPA has determined that the Clean Air Interstate Rule (CAIR) may satisfy BART requirements (40CFR 51.308(e)(4)) if the state participates in the EPA administered trading programs . In Louisiana there are 35 facilities that are subject to CAIR and Louisiana has two EPA approved CAIR SIPs (72 FR 55064, September 28, 2007 and 72 FR 39741, July 20, 2007) that rely on the EPA's trading programs. EPA estimates that the CAIR program will result in total 2015 Louisiana electrical generating units (EGUs) NOx and SO2 emissions of 92,000 tons. The department's emission inventory indicates 2006 EGU NOx and SO2 emissions to be 160,182 tons. There is a difference of 68,182 tons between the 2006 actual and the 2015 projected emissions or about 2000 tons per facility. The Rhodia consent decree reduces SO2 by 9000 tons and the ConocoPhillips consent decree reduces NOx and SO2 by 6300 tons, both more than triple the CAIR average. Since EPA determined that CAIR is better than BART then it appears that these consent decrees are also better than BART

EPA Comments:

1. **Comment:** Ammonia discussion/TAP discussion. If LDEQ is counting on emission reductions from this program as part of its regional haze strategy, it should provide the detail necessary for Region 6 to access it.
   Response: The department does not agree with the comment. EPA Region 6 has been receiving air toxic emissions data as part of the 105 grant for years. EPA should already know that since the promulgation of the state Air Toxics rule ammonia emissions have decreased from 50.5 million pounds in 1991 to 10.4 million pounds in 2005 for a decrease of about 80%. While the department is not counting on the Air Toxics Rule as part of its regional haze strategy, it is counting on the rule to maintain those ammonia emission reductions.
2. **Comment:** Please provide rationale for choosing 0.05 dv as the BART screening model threshold.
   Response: The department agrees with the comment and a short rationale has been added.

3. **Comment:** Word-smithing tweak requested on Page 9-3 "Initially, model-like facilities…from the BART requirement."
   Response: The department agrees with the comment, the whole chapter has been rewritten.

4. **Comment:** Trajectories comment same as FLM and Forestry.
   Response: The department agrees with your comment. See response to comment 4 from FLM above.

5. **Comment:** On page 9-7, LDEQ references Appendix E as including a spreadsheet containing the ratio of the total visibility impairing emissions to the distance to Class I areas. However, Appendix E only contains a listing of potential BART eligible units and does not contain their distances to Class I areas or the stated ratio. Since that information appears central to LDEQ's BART elimination strategy, LDEQ should revise Appendix E accordingly.
   Response: The department agrees with your comment. The spreadsheets listing BART-eligible units and their distances to the Class I areas have been included in the Chapter.

6. Page 9-1: Include additional information that describes in detail how it selected those sources listed in E to be BART eligible.
   a. Facilities initially identified
   b. Survey response verification
      Response: The department agrees with your comment. Additional information has been added to that section.

7. **Comment:** From the documentation on the hybrid BART screening modeling discussed on pages 9-7 through 9-14 some of the methodologies conducted and steps in the methodology are unclear. Appendices E-G appear to contain some of the BART engineering analyses and some tables and charts on the hybrid analysis, but not sufficient write-up to allow full review of the methodology and conclusions that were made. Links to where the modeling files can be downloaded for review or otherwise obtained should be included in the SIP write-up. In

general, LDEQ should revise this part of Chapter 9 to provide more detail on this strategy. In particular, LDEQ should address the following:

a. See comment 5
b. For the Caney Creek strategy, LDEQ states that instead of using a model plant approach, it modeled Smurfit Stone Container Enterprise and ChemTrade Refinery Services. LDEQ should provide more details on this strategy and how it effectively covers the ten other facilities that LDEQ states are closer to Caney Creek, and how the Graphic Packaging International facility is related to this investigation.
c. For the Breton strategy, LDEQ should explain how modeling the Conoco facility led to modeling Big Cajun 2, which led LDEQ to send letters to ten facilities requesting they perform refined CALPUFF modeling. It is also unclear if SO2 predominant sources were screened out based on the PM 2.5 modeling conducted by Big Cajun 2.
Response: The department agrees with your comments. The entire BART chapter has been rewritten to provide for more clarity.

8. **Comment:** LDEQ should discuss their final BART determinations that are contained in Appendix G in detail within the main section of the SIP, demonstrate how these facilities completed their respective five factor analyses under 51.308(e)(1)(iii)-(v) were satisfied, if applicable.
Response: The department agrees with the comment. Language will be added to satisfy this comment.

9. **Comment:** Although the impact of CAIR on BART is discussed briefly on page 9-8, LDEQ should expand this section so this is clear to the reader. LDEQ should still make an affirmative determination for fossil-fuel fired power plants having a total generating capacity greater than 750 megawatts pursuant to the BART guidelines, as required under 51.308(e)(1)(ii)(B). Region 6 understands that due to its CAIR participation this demonstration will be limited but it should still be made. LDEQ should also demonstrate how it has satisfied 308(e)(4) concerning CAIR documentation.
Response: The department agrees with your comment. Language will be added to the BART chapter to address CAIR participation.

Example Natural Background Calculation for Breton
The coefficients below were chosen at 90% relative humidity

Fs(RH)Small Sulfate--- 4.9

F_L(RH)Large Sulfate--- 3.53

Fs(RH)Small Nitrate— 4.9

F_L(RH)Large Nitrate— 3.53

Fss(RH)Sea Salt—5.12

From VIEWS
Rayleigh—11

The new refined IMPROVE algorithm with Trijonis' estimates for natural conditions:

2.2* F_s(RH)Small Sulfate * 0.227355 +4.8* F_L(RH)Large Sulfate * 0.002645

+2.4* F_s (RH)Small Nitrate * 0.0995 +5.1* F_L (RH) Large Nitrate* 0.0005

+2.8* Small Organic Carbon* 1.302 +6.1* Large Organic Carbon* 0.098

+10*0.02 +1*0.5 +1.7* F_{ss} (RH)Sea Salt * Sea Salt +0.6*3

+ Rayleigh= 32.95972928

10*LN(32.95972928/10)= 11.92701398